

**CITY OF LAS VEGAS AUDIT OVERSIGHT COMMITTEE**  
**City Hall, 400 Stewart Avenue**  
**Las Vegas, Nevada 89101**  
**City Manager Conference Room, Eighth Floor**  
**City of Las Vegas Internet Address: <http://www.lasvegasnevada.gov>**

**AGENDA**

**April 23, 2009**  
**10:00 AM**

ALL ITEMS ON THIS AGENDA ARE SCHEDULED FOR ACTION UNLESS SPECIFICALLY NOTED OTHERWISE. UNLESS OTHERWISE STATED, ITEMS MAY BE TAKEN OUT OF THE ORDER PRESENTED AT THE DISCRETION OF THE CHAIRPERSON.

DUPLICATE AUDIO CDS MAY BE AVAILABLE AT A COST OF \$5.00 PER CD THROUGH THE CITY CLERK'S OFFICE.

1. CALL TO ORDER
2. ANNOUNCEMENT RE: COMPLIANCE WITH OPEN MEETING LAW
3. Approval of the Final Minutes by reference of the Audit Oversight Committee Meeting of October 16, 2008
4. Discussion and possible action on the appointment of the Chairperson and Vice Chairperson for calendar year 2009
5. General Report by the City Auditor
6. Discussion and possible action on a request from Fire Rescue to perform an audit of overtime practices within the Fire and Rescue Information Technologies Unit
7. Discussion and possible action on a request for Audit of Arts and Community Events (West Las Vegas Arts Center and Charleston Heights Arts Center)
8. Discussion and possible action on a request from Municipal Court to complete the Minimum Accounting Standards Audit
9. Report by the City Auditor on IT Security and ID Theft
10. Report by the City Auditor on Parking Fines
11. Discussion and possible action on Internal Control Review Activity Report December 31, 2008 (2900-0809-04)
12. Discussion and possible action on the Audit of Detention and Enforcement's Inmate Booking and Release Processes (1403-0809-05)
13. Discussion and possible action on the Audit of Fire Prevention Division (1303-0809-06)

14. **CITIZENS PARTICIPATION:** Public comment during this portion of the agenda must be limited to matters within the jurisdiction of the Committee. No subject may be acted upon by the Committee unless that subject is on the agenda and is scheduled for action. If you wish to be heard, come to the podium and give your name for the record. The amount of discussion on any single subject, as well as the amount of time any single speaker is allowed, may be limited

15. **ADJOURNMENT**

Facilities are provided throughout City Hall for the convenience of disabled persons. Special equipment for the hearing impaired is available for use at meetings. If you need an accommodation to attend and participate in this meeting, please call the City Clerk's office at 229-6311 and advise of your need at least 48 hours in advance of the meeting. The City's TDD number is 386-9108.

**THIS MEETING HAS BEEN PROPERLY NOTICED AND POSTED AT THE FOLLOWING LOCATIONS:**

City Clerk's Bulletin Board, City Hall Plaza, 2nd Floor Skybridge  
Bulletin Board, City Hall Plaza (next door to Metro Records)  
Las Vegas Library, 833 Las Vegas Boulevard North  
Clark County Government Center, 500 S. Grand Central Parkway  
Grant Sawyer Building, 555 E. Washington Avenue

**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR**  
**DIRECTOR: RADFORD SNELDING**

**SUBJECT:**  
**CALL TO ORDER**



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT:** CITY AUDITOR  
**DIRECTOR:** RADFORD SNELDING

**SUBJECT:**  
ANNOUNCEMENT RE: COMPLIANCE WITH OPEN MEETING LAW



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR**  
**DIRECTOR: RADFORD SNELDING**

**SUBJECT:**

Approval of the Final Minutes by reference of the Audit Oversight Committee Meeting of October 16, 2008



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR'S OFFICE**  
**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

Discussion and possible action on the appointment of the Chairperson and Vice Chairperson for calendar year 2009

**Fiscal Impact**

No Impact

Augmentation Required

Budget Funds Available

**Amount:**

**Funding Source:**

**Dept./Division:**

**PURPOSE/BACKGROUND:**

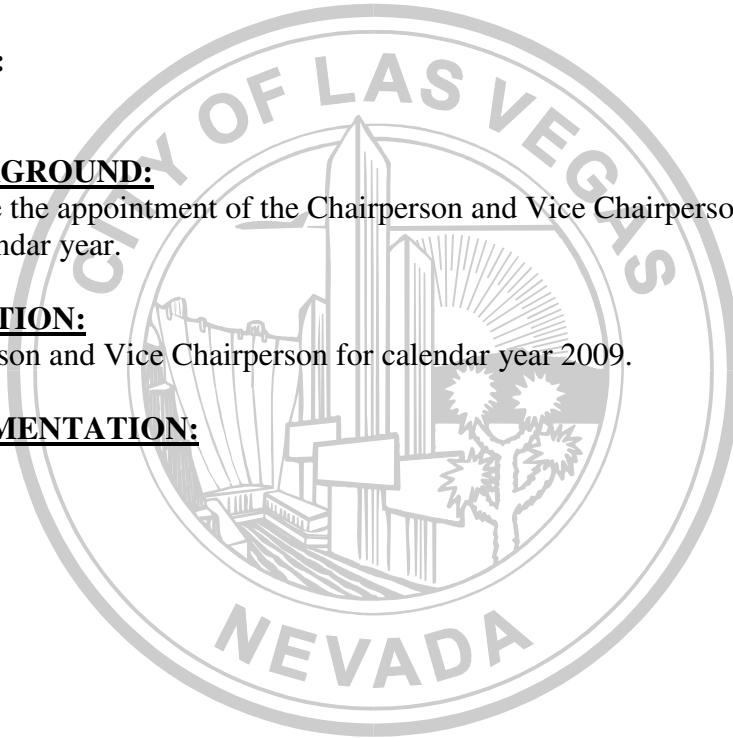
The Bylaws require the appointment of the Chairperson and Vice Chairperson at the first meeting of the calendar year.

**RECOMMENDATION:**

Appoint a Chairperson and Vice Chairperson for calendar year 2009.

**BACKUP DOCUMENTATION:**

None



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR'S OFFICE**  
**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

General Report by the City Auditor

**Fiscal Impact**

No Impact

Augmentation Required

Budget Funds Available

**Amount:**

**Funding Source:**

**Dept./Division:**

**PURPOSE/BACKGROUND:**

To give a status report on the audits and projects in progress and open investigations and control reviews. The City Auditor's Office has audits, projects, investigations, and control reviews as assigned in the annual audit plan. At each of the Audit Oversight Committee Meetings the City Auditor reports on the status of work currently open.

**RECOMMENDATION:**

Report only; no action required.

**BACKUP DOCUMENTATION:**

None



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR'S OFFICE**  
**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

Discussion and possible action on a request from Fire Rescue to perform an audit of overtime practices within the Fire and Rescue Information Technologies Unit

**Fiscal Impact**

No Impact  Augmentation Required  
 Budget Funds Available

**Amount:**  
**Funding Source:**  
**Dept./Division:**

**PURPOSE/BACKGROUND:**

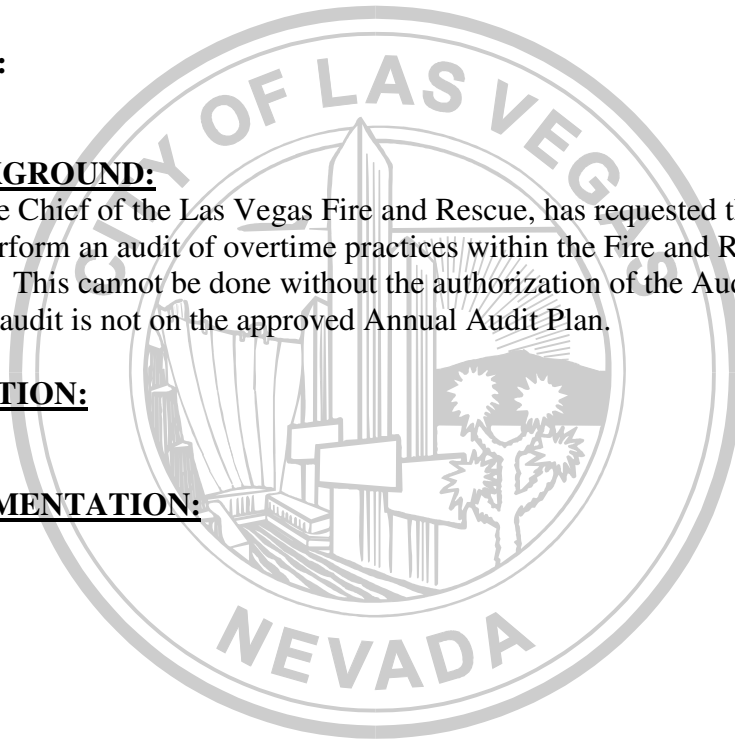
Greg Gammon, Fire Chief of the Las Vegas Fire and Rescue, has requested that the City Auditor's Office perform an audit of overtime practices within the Fire and Rescue Information Technologies Unit. This cannot be done without the authorization of the Audit Oversight Committee, as this audit is not on the approved Annual Audit Plan.

**RECOMMENDATION:**

Approval

**BACKUP DOCUMENTATION:**

None



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR'S OFFICE**

**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

Discussion and possible action on a request for Audit of Arts and Community Events (West Las Vegas Arts Center and Charleston Heights Arts Center)

**Fiscal Impact**

No Impact

Augmentation Required

Budget Funds Available

**Amount:**

**Funding Source:**

**Dept./Division:**

**PURPOSE/BACKGROUND:**

Robin McCartney, Supervisor of Arts & Community Events, ask that we perform a compliance audit of cash handling, procurement, and appropriation of grant funding of the West Las Vegas Arts Center and the Charleston Heights Arts Center.

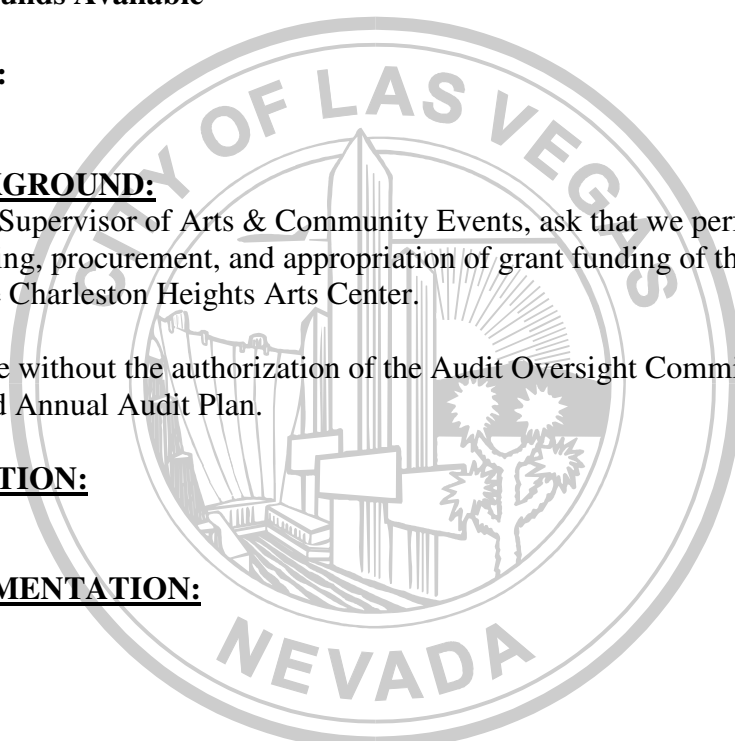
This cannot be done without the authorization of the Audit Oversight Committee, as this audit is not on the approved Annual Audit Plan.

**RECOMMENDATION:**

Approval

**BACKUP DOCUMENTATION:**

None



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR'S OFFICE**  
**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

Discussion and possible action on a request from Municipal Court to complete the Minimum Accounting Standards Audit

**Fiscal Impact**

No Impact

Augmentation Required

Budget Funds Available

**Amount:**

**Funding Source:**

**Dept./Division:**

**PURPOSE/BACKGROUND:**

A request was received from Municipal Court to complete the Minimum Accounting Standards Audit as required by the Administrative Office of the Courts. We performed this audit previously.

This cannot be done without the authorization of the Audit Oversight Committee, as this audit is not on the approved Annual Audit Plan.

**RECOMMENDATION:**

Approval

**BACKUP DOCUMENTATION:**

None



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR'S OFFICE**  
**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

Report by the City Auditor on IT Security and ID Theft

**Fiscal Impact**

No Impact

Augmentation Required

Budget Funds Available

**Amount:**

**Funding Source:**

**Dept./Division:**

**PURPOSE/BACKGROUND:**

This is a carry over item from a previous meeting.

The Committee discussed SB 347's requirement for encryption of emails. The Committee requested a report on the status of encryption of emails at the City.

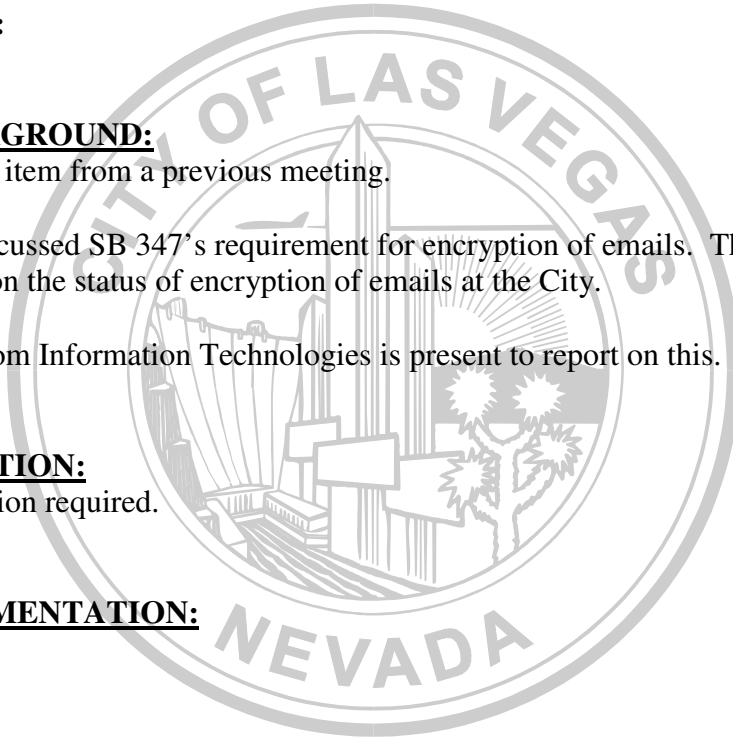
A representative from Information Technologies is present to report on this.

**RECOMMENDATION:**

Report only; no action required.

**BACKUP DOCUMENTATION:**

None



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR'S OFFICE**  
**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

Report by the City Auditor on Parking Fines

**Fiscal Impact**

No Impact

Augmentation Required

Budget Funds Available

**Amount:**

**Funding Source:**

**Dept./Division:**

**PURPOSE/BACKGROUND:**

This is a carry over item from a previous meeting.

The Committee discussed Parking Fines and asked that an update be provided. They were particularly interested in the collections to date and the status and amounts of uncollected fines.

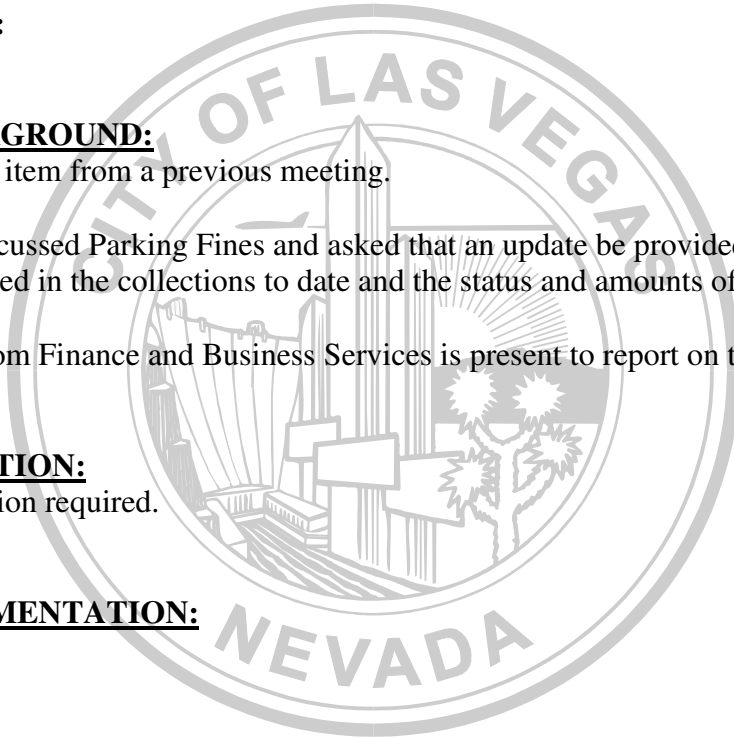
A representative from Finance and Business Services is present to report on this.

**RECOMMENDATION:**

Report only; no action required.

**BACKUP DOCUMENTATION:**

None



**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR'S OFFICE**  
**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

Discussion and possible action on Internal Control Review Activity Report December 31, 2008 (2900-0809-04)

**Fiscal Impact**

No Impact

Augmentation Required

Budget Funds Available

**Amount:**

**Funding Source:**

**Dept./Division:**

**PURPOSE/BACKGROUND:**

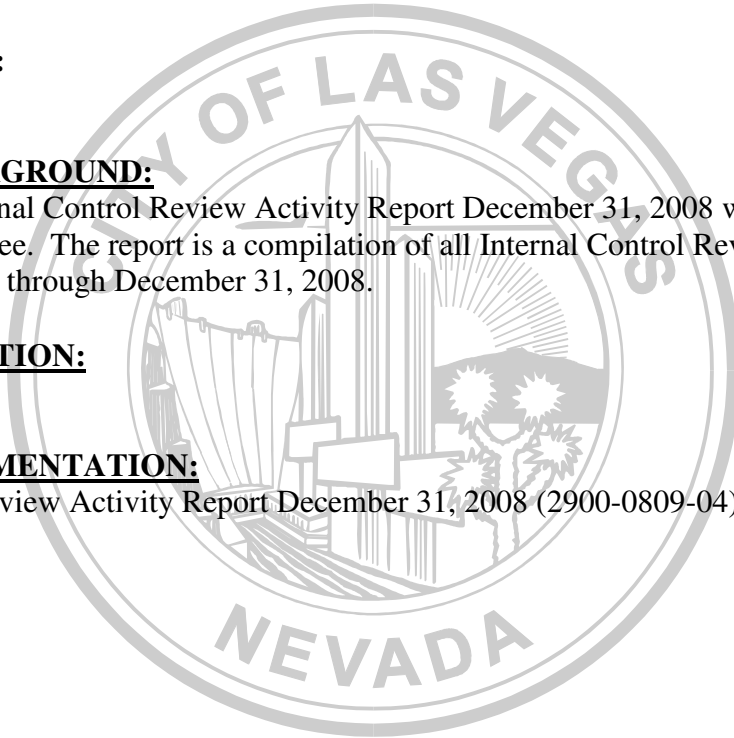
To review the Internal Control Review Activity Report December 31, 2008 with the Audit Oversight Committee. The report is a compilation of all Internal Control Reviews performed from June 30, 2008 through December 31, 2008.

**RECOMMENDATION:**

Approval

**BACKUP DOCUMENTATION:**

Internal Control Review Activity Report December 31, 2008 (2900-0809-04)



# **CITY AUDITOR'S OFFICE**



## **INTERNAL CONTROL REVIEW ACTIVITY REPORT DECEMBER 31, 2008**

**Report No. CAO 2900-0809-04**

**March 5, 2009**

**RADFORD K. SNELDING, CPA, CIA, CFE**

**CITY AUDITOR**

# INTERNAL CONTROL REVIEW ACTIVITY REPORT DECEMBER 31, 2008

**CAO 2900-0809-04**

## BACKGROUND

The City Auditor's Office has the responsibility to Evaluate, Enhance, Educate, and Enforce internal control issues that come to the Office's attention.

- **Evaluate** - The Office independently and objectively performs Internal Control Reviews to evaluate applicable internal controls through professional expertise and judgment.
- **Enhance** - After evaluation, the Office makes recommendations to enhance the adequacy and effectiveness of existing controls and further recommends additional controls as appropriate.
- **Educate** - Through the Internal Control Review Memorandums to management and the periodic Internal Control Review Activity Reports, the Office educates management and others of appropriate internal controls.
- **Enforce** - Enforcement is limited to supplying data to management to help them enforce the policies and procedures of the City.

The results of the Internal Control Reviews are reported in two steps:

- An Internal Control Review Memorandum is released to the appropriate levels of management and the Mayor and City Council. This Memorandum assists management in the timely correction of control deficiencies.
- Semiannually, a summary report is made of all findings and recommendations from the Internal Control Review Memorandums and released in a *formal Internal Control Review Activity Report*.

This report summarizes the Internal Control Review Memorandums issued since the last Internal Control Review Activity Report (June 30, 2008), including findings, recommendations, and management responses. The recommendations are included in the follow-up system for tracking purposes.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**OBJECTIVES**

Our objectives in completing the *Internal Control Review Activity Report* are to:

- Review all activity for the period noted relative to internal control reviews;
- Document for tracking purposes findings and recommendations noted in Internal Control Review Memorandums; and
- Report to the public the results of activities of the City Auditor's Office.

The objectives of each of the Internal Control Reviews were to:

- Determine the adequacy of existing internal controls;
- Determine the reason(s) for any control failure;
- Recommend corrective action; and
- Report the results of our review.

**SCOPE AND METHODOLOGY**

The scope of the audit was limited to Internal Control Review Memorandums issued from June 30, 2008 through December 31, 2008.

The scope of our work on internal control was limited to the controls within the context of the objectives and the scope of each Internal Control Review.

Our audit methodology during each of the Internal Control Reviews included:

- Observing operations.
- Interviewing personnel.
- Reviewing records, reports, and other applicable documentation.

We conducted this performance audit in accordance with generally accepted government auditing standards except for the requirement for an external peer review every three years. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**INTERNAL CONTROL MEMORANDUMS ISSUED**

**1. ICR-036 Internal Control Review: McWilliams Safekey Theft**

**Background**

In January 2007, a parent whose child attended McWilliams Safekey requested a receipt for a past cash payment. No receipt could be located. Further research into transactions at this Safekey site found the following irregularities during the period from October 23, 2006 through January 5, 2007:

- Other parents who had paid cash had not been given receipts and the transactions had not been recorded.
- 73 payments had not been recorded or included in the daily deposits.
- 4 payments were recorded but at a reduced amount (e.g., \$14 fee paid but recorded as \$6).
- A registration form had not been completed for several participants and accounts had not been established in the computer system.

An investigation into these irregularities showed that the Lead Instructor had taken approximately \$1,313 in Safekey revenue.

**Findings and Conclusions:**

In 2006, the City Auditor's Office completed an audit of Safekey payment collection controls and issued a report (CAO 1601-0607-05) that identified cash collection control deficiencies and the high risk of skimming at Safekey sites. The following deficiencies outlined within the audit report contributed to the opportunity for skimming at McWilliams Safekey:

- Unclear payment policies and procedures.
- Inconsistent payment collection practices.
- Inadequate payment collection oversight.
- Lack of reconciliations of children in attendance to revenues received.
- Inadequate non-payment collection procedures.

While Leisure Services has already addressed certain aspects of these deficiencies in response to the audit recommendations, several recommendations have not yet been fully addressed.

**Recommendation:**

1. Safekey Management should fully address the outstanding audit recommendations from the *Audit of Safekey Payment Collection Controls* report to further reduce the risk of skimming at Safekey sites.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**2. ICR-042 Internal Control Review: Culley Safekey Theft**

**Background**

In June 2007, the Safekey Administrative staff identified various irregularities in Culley Safekey's deposit records. Upon further investigation into these irregularities, staff members identified \$369 in cash payments that were never deposited. In addition, staff members identified that many children had been attending Culley Safekey without their parents paying for the service. The value of these unpaid services was found to be approximately \$5,851. The extent of the losses continues to be investigated.

**Findings and Conclusions:**

In 2006, the City Auditor's Office completed an audit of Safekey payment collection controls and issued a report (CAO 1601-0607-05) that identified cash collection control deficiencies and the high risk of skimming at Safekey sites. The following deficiencies outlined within the audit report contributed to the opportunity for skimming at Culley Safekey:

- Unclear payment policies and procedures.
- Inconsistent payment collection practices.
- Inadequate payment collection oversight.
- Lack of reconciliations of children in attendance to revenues received.
- Inadequate non-payment collection procedures.

While Leisure Services has already addressed certain aspects of these deficiencies in response to the audit recommendations, several recommendations have not yet been fully addressed.

**Recommendation:**

Safekey Management should fully address the outstanding audit recommendations in the *Audit of Safekey Payment Collection Controls* report to further reduce the risk of skimming and unpaid services at Safekey sites.

**3. ICR-048 Internal Control Review: Parson Safekey Theft**

**Background**

On February 26, 2008, a Safekey customer paid \$88.00 in cash and received a written receipt for the payment. At the end of the day when the Cash Summary was prepared there was a cash shortage of \$88.00. The Lead Instructor was interviewed but did not know what happened to the \$88.00 in cash and denied that she took it. Safekey admin staff visited the site and found the receipt book that contained a copy of the \$88.00 Cash Receipt marked "VOID". Detention and Enforcement concluded their investigation and were unable to identify a viable suspect.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**Findings and Conclusions**

In 2006, the City Auditor's Office completed an audit of Safekey payment collection controls and issued a report (CAO 1601-0607-05) that identified cash collection control deficiencies and the high risk of skimming at Safekey sites. The following deficiencies outlined within the audit report contributed to the opportunity for skimming at Parson Safekey:

- Unclear payment policies and procedures.
- Inconsistent payment collection practices.
- Inadequate payment collection oversight.
- Lack of reconciliations of children in attendance to revenues received.

While Leisure Services has already addressed certain aspects of these deficiencies in response to the audit recommendations, several recommendations have not yet been fully addressed.

**Recommendation:**

Safekey Management should fully address the outstanding audit recommendations from the *Audit of Safekey Payment Collection Controls* report to further reduce the risk of skimming at Safekey sites.

**4. ICR-049 Internal Control Review: Mirabelli Basketball Team**

**Background**

A Recreation Leader who recently transferred from Doolittle Community Center to Mirabelli Community Center had the Blue Chips Basketball program move from Doolittle Community Center to Mirabelli Community Center. The Blue Chips was at one time a City sponsored program but evolved into a private organization run by the Recreation Leader. Upon further review and interviews, it was discovered that the Recreation Leader was collecting funds from the Blue Chip participants and depositing them into his personal checking account. He was also using Mirabelli Community Center's address and phone number on private organization correspondence.

The City's CLASS system did not show any revenue for the Blue Chips use of the City's facilities. Additionally, the Recreation Leader was coaching and administering the Blue Chip's Basketball program while working on City time. The Recreation Leader's outside employment was not reported to Human Resources as required by City policy. The amount of revenue lost from allowing the Blue Chips to use the City's facilities without payment is currently unknown.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**Findings/Conclusions**

Leisure Services Management was unaware of the noted relationship with their customers, how their facilities were being used, and the expected revenues that the City should be receiving. As a result of this lack of awareness, there were uncollected revenues and increased liability to the City. In addition, management did not adequately consider the conflict of interest that can arise when an employee volunteers or is employed with an outside organization that uses City facilities.

**Recommendation 1:**

Leisure Services Management should ensure that all fees for leagues and classes are paid prior to participating in programs.

**Recommendation 2:** Leisure Services Management should ensure that all employees with outside jobs have an approved Outside Employment Request and that the outside employment does not conflict or compete with the interests of the City.

**Recommendation 3:** Leisure Services Management should ensure that none of its employees are acting as volunteers or employees of groups that use City facilities where there is a conflict of interest.

**5. ICR-050 Internal Control Review: Mobile Power Washer Theft**

**Background:** On January 22, 2008, a Park Maintenance Field Supervisor noticed that mobile power washer #3169 was missing from the equipment line where it was kept when not in use. The supervisor made several calls to see if other crews were using the power washer or if it had been left at another location. The mobile power washer with an estimated value of \$10,877 was never found. D&E investigated the incident but was unable to determine who took the power washer. According to the supervisor, the power washer was not secured at the time. The replacement power washer has a hitch lock that will deter unauthorized use.

**Findings / Conclusions:**

The following control weaknesses contributed to this theft:

- There were no anti-theft devices to prevent the theft of the mobile power washer
- There are no surveillance cameras at the East Yard exit gates at the to record what vehicles and/or equipment is leaving the yard
- The gates at the East Yard open automatically when exiting which allow anyone to leave the yard with unauthorized vehicles or equipment.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**Recommendation 1:**

Field Operations Management should install concrete posts for mobile equipment to be locked and chained to when not in use.

**Recommendation 2:**

Field Operations Management should consider installing video surveillance cameras at the exit gates.

**Recommendation 3:**

Field Operations Management should consider installing LoJack/GPS devices on high cost equipment items.

**Recommendation 4:**

Field Operations Management should develop an inventory control system to account for all equipment and track locations.

**MANAGEMENT RESPONSES  
TO  
INTERNAL CONTROL REVIEW ACTIVITY REPORT**

**1. ICR-036 Internal Control Review: McWilliams Safekey Theft**

**Recommendation:**

Safekey Management should fully address the outstanding audit recommendations from the *Audit of Safekey Payment Collection Controls* report to further reduce the risk of skimming at Safekey sites.

**Management Response**

The following procedures have been implemented at all Safekey sites whether they are on the CLASS point of sale system or a cash summary (handwritten receipts only) site.

1. Unclear payment policies and procedures
  - Safekey now has a payment policy which leaves little room for misinterpreting. The payment policy has a weekly or daily rate payment for the program. The policy states that if the weekly rate is not paid by Friday at 6 pm for the following week, the daily rate will apply for the following week. If the participant comes on Tuesday and payment has not paid, then the participant is escorted to the school office and may not return until payment is made in full. If payment is not received for a drop-in participant, the participant may not return until payment is made.
  - Signage explaining the policy is posted at every site and is stated in the parent handbook and on the participation form which parents sign upon initial registration into the program.
2. Inconsistent payment collection practices
  - Each Safekey Region Supervisor is tasked to do a weekly site audit. This is done by comparing the sign in/out sheet to the registrations taken. The sign in/ out sheet should match up to the amount collected. If it does not, then the site leader/cashier is questioned and appropriate steps are taken to make sure that payment is collected and/or proper disciplinary action will be taken.
  - There are other reports that are accessed through CLASS that will assist in the audit: Amounts Due and Paid, Refunds, Credits etc. The Safekey Region Supervisor is tasked with utilizing these reports to ensure proper collection procedures are followed.
  - Signage has been placed at each site that states: “*You are entitled to a receipt. Make sure that you keep your receipt as proof of payment. If you do not receive a receipt, please call 229-3312 or 229-6512.*” The signage notifies parents that it is their responsibility to procure a receipt and our obligation to provide one.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

3. Inadequate payment collection oversight
  - Each time a Safekey Region Supervisor visits a site (which is a minimum of three times a week), a site audit is conducted. Among the steps to a site audit is verification that the number of children is identical to the number of payments, and the number of participants is the same as the number on the sign in /out sheets. If the numbers do not match, a roll call is taken.
  - If discrepancies are found, the site staff is put on notice to make corrections. An extensive audit of the week will then be conducted in the Safekey office and if other discrepancies are found, the proper disciplinary action will be taken. This may also be a red flag that a full site audit from beginning of school year to present may be advised.
4. Lack of reconciliations of participants in attendance to revenues received
  - See #3
5. Inadequate non-payment collection procedures
  - It has been instituted in our cash flow procedures training that if payment is not received for services, it is to be entered into the participant's CLASS account as balance due. There is a procedure built into CLASS that if no payment is received for 30 days, a reminder letter is generated and mailed to the customer. After 60 days, a letter is generated that states if payment is not brought current within 30 days the account will be sent to a collection agency. At 120 days, the account is sent to collections.
  - If payment is not made at a handwritten receipt site, then the non-payment is logged onto a Non-Payment log. The Safekey Region Supervisor then enters the amount owed as a balance on account in the CLASS account, and the above collection process is put into action.
6. Beginning with the 2008-2009 school year, all Safekey sites will be cashless, which should help eliminate the temptation of skimming.

**Estimated Date of Completion:** All of the above recommendations will be in place and enforced at the beginning of the 2008-09 school year.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**2. ICR-042 Internal Control Review: Culley Safekey Theft**

**Recommendation:**

Safekey Management should fully address the outstanding audit recommendations in the *Audit of Safekey Payment Collection Controls* report to further reduce the risk of skimming and unpaid services at Safekey sites.

**Management Response:**

Effective August 25, 2008 the City of Las Vegas Safekey program instituted a “no cash payment” policy at all CCSD sites. Customers may pay for Safekey services at the site using any of the following methods: credit card, debit card, personal check or money order. Customers who wish to pay for services with cash are directed to the nearest Leisure Services facility where staff at that location will take the cash payment and complete the transaction. This policy has eliminated the opportunity for fraud as Safekey field staff no longer handles any cash. Safekey management has created several training tools and documents that clearly outline and provide direction to line staff regarding accepted cash handling and reporting procedures. These tools are available in hard copy and electronically are used throughout the year to train staff. Additionally, management staff has created a draft document that will outline the steps and processes that Recreation Leaders will use when they perform a cash handling review. Processes to be included in the cash handling review are: reconciliation of attendance vs. revenue, inspection of non-payment records and adherence to collection procedures. This document will also include a means to track and record the number of reviews completed by the Recreation Leader as well as the outcome of each review.

**Estimated Date of Completion:** Completed on August 25, 2008.

**3. ICR-048 Internal Control Review: Parson Safekey Theft**

**Recommendation:**

Safekey Management should fully address the outstanding audit recommendations from the *Audit of Safekey Payment Collection Controls* report to further reduce the risk of skimming at Safekey sites.

**Management Response:**

Effective August 25, 2008 the City of Las Vegas’ Safekey Program instituted a “no cash payment” policy at all CCSD sites. Customers may pay with any of the following at the site; credit or debit card, check or money. Customers who wish to pay with cash are directed to the nearest Leisure Services center in order to complete their transaction. This policy has effectively eliminated the opportunity for Safekey Field Staff to defraud the city by stealing cash payments.

**Estimated Date of Completion:** Completed on August 25, 2008.

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**4. ICR-049 Internal Control Review: Mirabelli Basketball Team**

**Recommendation 1:**

Leisure Services Management should ensure that all fees for leagues and classes are paid prior to participating in programs.

**Management Response:** Leisure Services Management will ensure that Community Center Coordinators will review CLASS Program Registrations for all Leagues. This will provide us with an accurate account on the number of teams that have paid registration fees. The review and verification of collected revenues will be compared or matched with league schedules. This will provide us with an accurate account of participating teams per league. In the case of Leagues with Individual Registrations, Coordinators will review CLASS Program Registration Reports and cross reference those with participant Waiver-of Claims and Roster/Enrollment forms. These actions will be verified by Leisure Services Field Supervisors that oversee the operations of a said facility.

**Estimated Date of Completion:** November 3, 2008

**Recommendation 2:** Leisure Services Management should ensure that all employees with outside jobs have an approved Outside Employment Request and that the outside employment does not conflict or compete with the interests of the City.

**Management Response:** Leisure Services Management will mandate that all staff submit an outside employment form once a year and when not applicable the employee will sign that he/she does not have another job outside of the city.

**Estimated Date of Completion:** November 3, 2008

**Recommendation 3:** Leisure Services Management should ensure that none of its employees are acting as volunteers or employees of groups that use City facilities where there is a conflict of interest.

**Management Response:** Leisure Services Management will instruct its staff that they are not allowed to volunteer with groups that use city facilities in a financial capacity that may afford that group an advantage or where it poses a conflict of interest with city programming.

**Estimated Date of Completion:** November 3, 2008

**INTERNAL CONTROL REVIEW  
ACTIVITY REPORT  
DECEMBER 31, 2008  
CAO 2900-0809-04  
March 5, 2009**

**5. ICR-050 Internal Control Review: Mobile Power Washer Theft**

**Recommendation 1:**

Field Operations Management should install concrete posts for mobile equipment to be locked and chained to when not in use.

**Management Response:** Parks and Open Spaces will begin the process to install concrete embedded rings at the ESC that can be used to lock and chain the power washers and any other trailer mounted equipment. Equipment, when not in use, is currently tongue-locked so that it cannot be connected to a vehicle.

**Estimated Date of Completion:** September 2008

**Recommendation 2:**

Field Operations Management should consider installing video surveillance cameras at the exit gates.

**Management Response:** The CLV Safety/Loss Divisions is in the process of purchasing and installing video surveillance equipment at both the ESC and WSC to better secure each site. Neighborhood Services has volunteered to monitor these video surveillance cameras.

**Estimated Date of Completion:** October 2008

**Recommendation 3:**

Field Operations Management should consider installing LoJack/GPS devices on high cost equipment items.

**Management Response:** The Streets and Sanitation Divisions has placed GPS units on all of their Sweepers (approx. \$150,000/unit), Vactors (approx. \$250,000/unit), 18-wheelers, etc.

**Estimated Date of Completion:** Completed

**Recommendation 4:**

Field Operations Management should develop an inventory control system to account for all equipment and track locations.

**Management Response:** Parks and Open Spaces Division is in the process of researching and reviewing the opportunity to add two additional reporting locations. Once all reporting locations are determined, we will look into developing an inventory control system based on vehicle location.

**Estimated Date of Completion:** 1/09

**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT:** CITY AUDITOR'S OFFICE  
**DIRECTOR:** RADFORD SNELDING

Consent  Discussion

**SUBJECT:**

Discussion and possible action on the Audit of Detention and Enforcement's Inmate Booking and Release Processes (1403-0809-05)

**Fiscal Impact**

No Impact  Augmentation Required  
 Budget Funds Available

**Amount:**  
**Funding Source:**  
**Dept./Division:**

**PURPOSE/BACKGROUND:**

To review the audit report Audit of Detention and Enforcement's Inmate Booking and Release Processes (1403-0809-05)

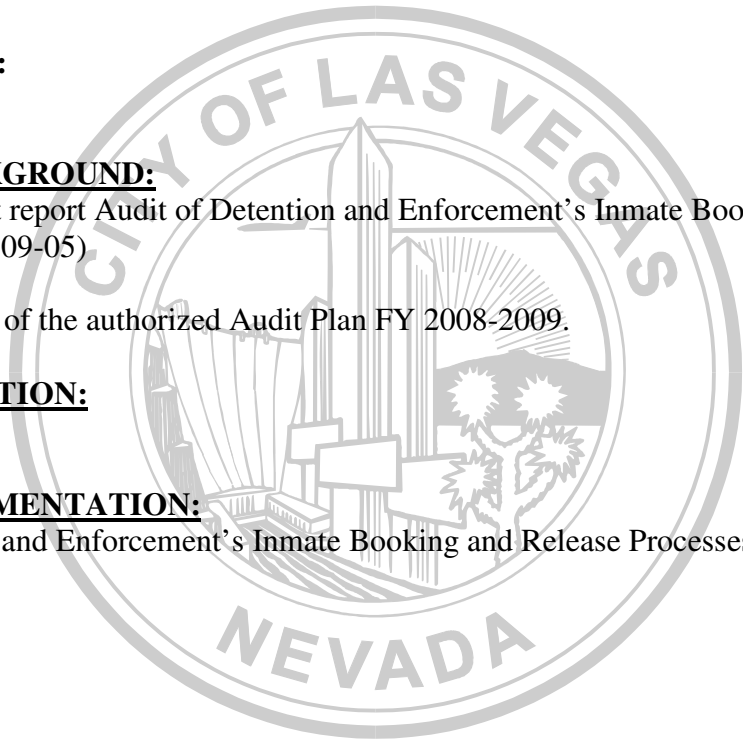
This audit was part of the authorized Audit Plan FY 2008-2009.

**RECOMMENDATION:**

Approval

**BACKUP DOCUMENTATION:**

Audit of Detention and Enforcement's Inmate Booking and Release Processes (1403-0809-05)



# **CITY AUDITOR'S OFFICE**



## **Audit of Detention and Enforcement's Inmate Booking and Release Processes**

**Report No. CAO 1403-0809-05**

**April 2, 2009**

**RADFORD K. SNELDING, CPA, CIA, CFE**

**CITY AUDITOR**

## TABLE OF CONTENTS

|   |           |
|---|-----------|
| <b>BACKGROUND .....</b>   | <b>1</b>  |
| <b>OBJECTIVES .....</b>   | <b>2</b>  |
| <b>SCOPE AND METHODOLOGY .....</b>  | <b>2</b>  |
| <b>CONCLUSIONS, FINDINGS AND RECOMMENDATIONS.....</b>                     | <b>2</b>  |
| <b>1. Controls over Inmate Cash Received During the Booking Process..</b> | <b>4</b>  |
| <b>2. Controls over Funds Placed on Account for Inmates .....</b>         | <b>7</b>  |
| <b>3. Business Office Inmate Fund Deposit Process.....</b>                | <b>9</b>  |
| <b>4. Return of Inmate Funds upon Release .....</b>                       | <b>11</b> |
| <b>5. Safeguarding Checks Used for Federal Inmates .....</b>              | <b>13</b> |
| <b>6. Voiding Bail Transactions and the Audit of Bail Deposits .....</b>  | <b>14</b> |
| <b>7. Inmate Sentence Calculation .....</b>                               | <b>15</b> |
| <b>8. Offendertrak Computer System Access .....</b>                       | <b>17</b> |
| <b>9. Municipal Court Mainframe Computer System Access.....</b>           | <b>19</b> |
| <b>MANAGEMENT RESPONSE .....</b>  | <b>21</b> |

# AUDIT OF DETENTION AND ENFORCEMENT'S INMATE BOOKING AND RELEASE PROCESSES CAO 1403-0809-05

## BACKGROUND

Individuals arrested on misdemeanor offenses within City of Las Vegas (City) limits are booked into the detention center located at 3200 Stewart Avenue. The Department of Detention and Enforcement (Detention and Enforcement) operates the detention center pursuant to Nevada Revised Statute (NRS) 211.

The Law Enforcement Support Unit includes three supervisors and eighteen Law Enforcement Support Technicians (LEST). The LESTs process the paperwork and input information into the jail management system. The functions include inmate booking, sentencing, bail, and inmate release documentation.

Seven correction officers are assigned to processing inmates into the detention center. The functions include taking custody of inmates from the arresting officer, patting down the inmates, taking an inventory of inmate property, and taking inmates pictures and fingerprints. Inmates also receive medical and classification reviews to identify any special medical needs and ensure that inmates are appropriately housed in the facility.

Three Business Office staff members are responsible for preparing inmate deposits to an Inmate Trust Account and performing audits of the bail deposits.

Between the period of November 2007 (implementation of a new jail management system) and August 2008, 26,468 inmates were booked into the detention center and 25,849 inmates were released.

Detention and Enforcement is in the process of migrating to a new jail management system called Offendertrak. The following phases of the implementation have been completed:

- **Phase I:** Correction officers began using inmate daily activity logs in September 2006.
- **Phase II:** The use of the core software module including inmate booking and release was implemented in November 2007.
- **Phase III:** The inclusion of inmate photographs within Offendertrak was implemented in March 2008.
- **Phase IV:** The use of inmate property receipt forms was implemented in April 2008.

## OBJECTIVES

The audit objective was to ensure the adequacy of existing management controls over the booking and releasing of inmates.

## SCOPE AND METHODOLOGY

The scope of the audit included auditing inmate booking and release processes for the period of November 2007 through August 2008.

The scope of our work on internal controls was limited to the controls within the context of the audit objectives and the scope of the audit. Our last fieldwork date was December 5, 2008.

Our audit methodology included:

- Research of applicable guidelines,
- Interviews of City personnel,
- Observations of work processes, and
- Analysis and detail testing of available data.

We conducted this performance audit in accordance with generally accepted government auditing standards except for the requirement for an external peer review every three years. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The exception to full compliance is because the City Auditor's Office has not yet undergone an external peer review. However, this exception has no affect on the audit or the assurances provided.

## CONCLUSIONS, FINDINGS AND RECOMMENDATIONS

In the completion of the Audit of Detention and Enforcement's Inmate Booking and Release Processes, we determined that management controls over inmate booking and release need improvement in the following areas:

- ***Controls over Inmate Cash Received During the Booking Process (Finding #1):*** Management controls over the custody of inmate cash obtained when inmates are booked into the detention center are deficient.
- ***Controls over Funds Placed on Account for Inmates (Finding #2):*** Adequate segregation of duties over funds placed on account for inmates are not in place.

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

- ***Business Office Inmate Fund Deposit Process (Finding #3):*** Adequate segregation of duties and oversight of the inmate fund deposit process are not in place.
- ***Return of Inmate Funds upon Release (Finding #4):*** The process of returning funds to inmates when they are released from the detention center is an ineffective use of City resources and a high percentage of the funds are turned over to the State of Nevada as unclaimed property.
- ***Safeguarding Checks Used for Federal Inmates (Finding #5):*** Blank checks and the endorsement stamp are not adequately secured.
- ***Voiding Bail Transactions and the Audit of Bail Deposits (Finding #6):*** Adequate segregation of duties over voiding bail transactions is not in place. Business Office audit procedures do not ensure that all transactions have been correctly processed.
- ***Inmate Sentence Calculation (Finding #7):*** The calculation of good time off should be re-evaluated considering differences in the method used by other agencies. Offendertrak calculated release dates are not always the same as manually calculated release dates.
- ***Offendertrak Computer System Access (Finding #8):*** Individuals who no longer need access to Offendertrak have active user access rights.
- ***Municipal Court Mainframe Computer System Access (Finding #9):*** Individuals who no longer need access to the Municipal Court Mainframe Computer System have active user access rights.

Further information is contained in the following sections.

## **1. Controls over Inmate Cash Received During the Booking Process**

### **Criteria**

Management controls should adequately secure inmate cash when inmates are booked into the detention center.

### **Condition**

Correction officers inventory inmate property as part of the booking process, as follows:

- A correction officer and the inmate inventory all property items including cash. The property items are listed as line items in the Offendertrak property receipt form. Inmates electronically sign property receipts indicating they agree with the inventory.
- Correction officers record cash amounts greater than twenty dollars on a three-part sequentially numbered manual receipt. One part of the receipt remains in the receipt book, one part is placed with the inmate's property, and the third part is sealed in a clear plastic bag (bag) with the cash.
- Correction Officers drop the bags into a dual lockbox accessible by the Law Enforcement Support Unit.
- Each shift, the LESTs transfers the bags from the dual lockbox to a dual lock file cabinet and enters the inmate name, identification number and receipt number into an Access database. A report is generated from the Access database and the bags are inventoried.
- Inmate cash remains in the dual locked file cabinet until either:
  - returned to inmates upon release
  - transferred to the Business Office for bank deposit when inmates are sentenced.
- Cash deposits are posted to an Inmate Trust Account and the Keefe Commissary system. Inmates use these funds to purchase commissary items.
- The receipt and deposit and subsequent return of inmate funds consist of four different tracking systems (sequentially numbered manual receipts, Offendertrak, Access database, and the Keefe Commissary System).

The following deficiencies in management controls over the custody of inmate cash received during the booking process were identified:

- The various systems are not reconciled to ensure that the amount deposited agrees with the amount received from inmates.
- The manual receipt numbers are entered into an Offendertrak comment field and cannot be easily extracted for analysis. A review of the Offendertrak property records showed that a consistent process is not followed to enter the manual receipt numbers into Offendertrak.

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

- Inmate property is not dual verified by Detention and Enforcement staff. Dual verification provides increased assurance of the accuracy of receipted property should inmates who were impaired when booked challenge the initial inventory.
- The LESTs have physical access to both keys for the dual lockbox and dual locked file cabinet. Having access to both keys enables one staff member access to inmate cash without detection.
- The LESTs do not verify the amount of cash included in the bags when the cash is initially inventoried or placed into the dual lockbox.
- The shift reconciliation only consists of ensuring that all of the bags are accounted for. No verification of the cash is completed.
- An observation of the shift reconciliation process showed an instance where a bag seal was broken. The LEST simply had a correction officer reseal the bag. The contents of the bag were not verified.
- The LESTs use an Access database to monitor the flow of inmate cash in the unit. A review of the manual receipts issued between January 1, 2008 and August 30, 2008 showed the following issues with this process:
  - LESTs record the inmate identification number, name, and receipt number into the Access database. However, the cash amount is not indicated.
  - The review noted that 34 issued manual receipts were missing. Subsequent audit procedures showed that not all of the receipts were entered into the Access database before the cash was returned to the inmates.
  - Thirty issued manual receipts were entered incorrectly into the Access database.
- When used correctly, sequentially numbered receipts are used as a control mechanism to identify missing or altered transactions. In this situation, receipt numbers only serve as a routing and identifying number. The following issues relating to the manual receipt process were identified:
  - The copy of the receipt that remains in the receipt book is not matched to the copy that accompanies the inmate cash to determine if alterations occurred.
  - The receipt number sequence is not reviewed and follow-up is not performed on unaccounted for receipts.
  - Implementation of these reconciliation steps would prove to be a very labor intensive monitoring process due to the number of receipts completed each shift. 4,772 manual receipts were prepared during our review time period.
- A Business Office staff member indicated that when preparing bank deposits, the dollar amount counted is sometimes different than the amount written on the manual receipt. The current practice is to post the amount deposited to the Keefe Commissary System. The difference is not indicated anywhere else and no additional follow-up is performed.

Detention and Enforcement management have indicated they are researching various options for receipting cash from inmates during the booking process.

### **Cause**

Current processes were developed over time to address issues. An overall control assessment was not completed.

### **Effect**

- Limited assurance that cash received from inmates is either returned or deposited.
- Increased staff time and data entry errors when entering same data into different systems.
- Decreased control over cash when systems are not reconciled.

### **Recommendation**

Detention and Enforcement management should implement the following management controls:

- Establish a single system to track cash receipted when inmates are booked into the detention center.
- Ensure that the system includes:
  - dual verification by Detention and Enforcement staff of the inmates' initial cash amounts,
  - a consistent method to document amounts receipted,
  - the ability to reconcile receipted cash to amounts returned or deposited for inmates, and
  - follow-up procedures when the dollar amount of receipted cash differs from the amount deposited.
- Establish physical controls over the keys to the dual lockbox and file cabinet for inmate funds stored in the Law Enforcement Support Unit. The physical controls should require employees from different lines of authority be present to open the dual lockbox and file cabinet.

Detention and Enforcement management is considering outsourcing the function of receipting cash received from inmates during the booking process. If outsourced, Detention and Enforcement management should ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,
- the computer system is adequately secured and appropriate backup procedures are in place, and
- they have established periodic monitoring procedures and reporting requirements.

## 2. Controls over Funds Placed on Account for Inmates

### Criteria

Management controls over funds placed on account for inmates should include a segregation of duties between the initial receipt and the deposit of funds functions and a subsequent independent review of documentation.

The City's Cash Handing Procedure (FN302a) provides guidelines on cash receipts received through the mail that should be followed for the receipt of inmate funds:

*When a payment is received:*

*Through the incoming mail, two employees (when possible and other than the cashier or accounting personnel):*

- *Open the mail*
- *One employee restrictively endorses checks collected "FOR DEPOSIT ONLY" immediately upon receipt and records the revenue on a pre-list*
- *Both employees initial the pre-list.*

*An employee (other than the cashier) designated by the department director shall:*

*Ensure that the cash, checks, and revenue receipts are in agreement.*

### ***Detention and Enforcement Policy COR-6390 Inmate Funds Mail Room Receipts***

*Two staff members should be present to open mail.*

### Condition

Sentenced inmates can place funds on account in the Inmate Trust Account to purchase commissary items. Two of the methods used to accept inmate funds are:

- ***Drop Box:*** Individuals are instructed to prepare sequentially numbered envelopes with a tear off receipt and deposit the envelopes with money orders enclosed into a drop box located in front of the Detention and Enforcement Administrative Office. The Business Office staff member, who prepares the bank deposit, collects the envelopes from the drop box.
- ***Mail Receipts:*** Money orders are mailed to the detention center. A correction officer opens the envelopes and forwards the money orders to the Business Office. Business Office staff members complete sequentially numbered envelopes with a tear off receipt for each money order.

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

The following segregation of duty deficiencies relating to funds placed on account for inmates were identified:

- The initial collection of money orders dropped in the drop box is completed by the same employee who prepares the deposit. This process provides an opportunity for the employee to take money orders before preparing the bank deposit.
- The initial collection of the money orders received through the mail is completed by one correction officer. This employee records all money order receipts in a money log, makes copies of the money orders, and forwards the money orders and copies to the Business Office. This process provides an opportunity for the employee to take money orders before they are submitted to the Business Office.
- An independent reconciliation of bank deposits to source documents is not completed.
- Although sequentially numbered envelope receipt numbers are used, the distribution of the envelopes is not controlled. Therefore, the receipt numbers serve only as a routing and identifying numbers.

**Cause**

Current processes were developed over time to address issues. An overall control assessment was not completed.

**Effect**

Without adequate segregation of duties, there is limited assurance that funds submitted for inmates have been properly deposited and posted to inmate commissary accounts.

**Recommendation**

Detention and Enforcement management should implement the following management controls:

- The initial opening of inmate funds received should be completed by two individuals and recorded on a pre-list. A copy of the pre-list should be forwarded to an employee independent of the deposit process.
- The inmate funds and a copy of the pre-list should be forwarded to the Business Office to be used for the deposit and posting to the commissary system.
- Once the deposit is complete, the deposit documentation and a summary from the commissary system should be forwarded to the same third party noted above. This individual should complete a review of the documentation to ensure all funds collected have been deposited and posted to the correct inmate account in the commissary system.

Detention and Enforcement management in coordination with Finance and Business Services is researching the feasibility of outsourcing receipting inmate funds submitted through the mail and the drop box. If outsourced, Detention and Enforcement management should ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,
- the computer system is adequately secured and appropriate backup procedures are in place, and
- they have established periodic monitoring procedures and reporting requirements.

### **3. Business Office Inmate Fund Deposit Process**

#### **Criteria**

Management controls over the bank deposit process should include adequate segregation of duties including an independent confirmation of deposits and follow-up on inquiries relating to what was deposited.

#### ***City Cash Handing Procedure (FN302a)***

*An employee (other than the cashier) designated by the department director shall: Ensure that the cash, checks, and revenue receipts are in agreement.*

#### **Condition**

Business Office staff members prepare the Inmate Trust Account bank deposits. A review of 25 bank deposits for the period of November 1, 2007 through August 30, 2008 showed funds were placed on deposit for 1,101 inmates. Funds for these inmates were receipted as follows:

| <b>Type</b>       | <b>Number</b> | <b>Percentage of Total</b> |
|-------------------|---------------|----------------------------|
| Mail Receipts     | 154           | 14 %                       |
| Drop Box Receipts | 790           | 72 %                       |
| Booking           | 57            | 5 %                        |
| CLV/CCDC Checks   | <u>100</u>    | <u>9 %</u>                 |
| Totals            | <u>1,101</u>  | <u>100 %</u>               |

Observations of the deposit process and a review of available documentation showed the following management control weaknesses associated with the Inmate Trust Account bank deposit process:

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

- Each deposit is performed by one employee and the office where the deposits are prepared is not covered by video surveillance.
- Independent checks of deposits are not completed.
- The documentation for 25 inmate fund deposits was reviewed during detail testing. This documentation included 157 copies of money orders. Two of money orders were posted to the wrong inmate commissary account. Unless inmates monitor their accounts and request follow-up when their accounts appear incorrect, these errors are not found or corrected. Not all inmates closely monitor their commissary accounts.
- Employees that prepare the deposit are the same employees who follow-up on inmate inquiries about their accounts. This represents a lack of segregation of duties.

### **Cause**

Current processes were developed over time to address issues. An overall control assessment was not completed.

### **Effect**

The potential exists that the individual who prepares the Inmate Trust Account bank deposit could take funds without detection.

### **Recommendation**

Detention and Enforcement management should implement controls to ensure that:

- Any funds forwarded to the Business Office for deposit include a listing by inmate and dollar amount of the funds that were transferred. This listing should also be forwarded to an individual independent of the deposit process.
- A copy of the deposit documentation and summary of the documentation posted to the commissary system is forwarded to the same independent individual. This individual should complete a review of the documentation to ensure all funds collected have been deposited and posted to the correct inmate account in the commissary system.
- An individual independent of the deposit process should complete follow-up on inmate inquiries.

Detention and Enforcement management is considering outsourcing the function of receipting funds receipted for inmates. Any funds placed on account would be deposited by this entity. If outsourced, Detention and Enforcement management should ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,

- the computer system is adequately secured and appropriate backup procedures are in place, and
- they have established periodic monitoring procedures and reporting requirements.

#### **4. Return of Inmate Funds upon Release**

##### **Criteria**

Effective procedures should be in place to ensure that funds held on account for inmates are timely returned to them.

##### **Condition**

Inmates with one dollar or more on account in the commissary system receive City checks for their remaining balance when they are released from the detention center. The following process is used to print the checks and return funds to inmates:

- Once a week, the Business Office prints an Offendertrak report that shows all inmates eligible for release within the next 7 days.
- Twice a day, the Business Office receives a report that is automatically generated from Offendertrak. This report shows all the inmates that were released from the detention center.
- The Business Office uses the above 2 reports to determine which inmates have outstanding balances by querying the inmate names in the commissary system.
- Twice a day, the Business Office prepares a listing of inmates who were released with a balance on their commissary account. This listing is e-mailed to Finance and Business Services and Law Enforcement Support Unit.
- Twice a day, when the Finance and Business Services staff member receives the inmate listing, he stops what he is doing to process and print the checks.
- Twice a day, a Detention and Enforcement transport officer picks up the inmate checks from Finance and Business Services and delivers them to the bail window.
- After the LEST prepares the Release Vouchers, a correction officer processing inmate releases retrieves the inmate checks and gives them to the inmates.

Finance and Business Services estimates it costs the City \$11.16 to process each inmate check. This estimate takes into consideration the manpower cost for Finance and Business Services and the transport officer. It does not represent the full cost since the Business Office time was not included in the estimate. In fiscal years 2007 and 2008, Finance and Business Services processed 3,237 and 3,490 inmate checks respectively. Based upon the estimate provided above, it cost the City \$36,125 in fiscal year 2007 and \$38,950 in fiscal year 2008 to process inmate checks.

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

Annually, Finance and Business Services determines how many released inmate checks have been outstanding for more than a year. In fiscal years 2007 and 2008, 1,513 checks totaling \$32,521 and 906 totaling \$17,933 respectively were identified and forwarded to the State of Nevada as unclaimed property.

Detention and Enforcement management is aware of the inefficiencies with this process and is currently evaluating options to improve the effectiveness of returning funds to inmates when they are released from the detention center.

### **Cause**

This process was developed over time without an overall assessment to improve the efficiency of the process.

Two contributing factors for inmates not cashing their checks are:

- Not all inmate checks are available when inmates are released. Inmates do not always return to the detention center and pick up their checks.
- Inmates do not always have proper identification to cash their checks.

### **Effect**

The impact of continuing processing inmate checks in this manner includes:

- High cost of printing checks,
- Ineffective use of City employee time, and
- As noted above, a large percentage of inmate checks are not cashed.

### **Recommendation**

Detention and Enforcement management should:

- Evaluate the alternative methods for returning inmate funds.
- Limit processing inmate fund returns to once each day.

Detention and Enforcement management is considering outsourcing the function of returning funds to inmates. If outsourced, Detention and Enforcement management should ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,
- the computer system is adequately secured and appropriate backup procedures are in place, and
- they have established periodic monitoring procedures and reporting requirements.

## **5. Safeguarding Checks Used for Federal Inmates**

### **Criteria**

Management controls should ensure that access to blank checks and endorsement stamps are adequately secured to ensure that one employee cannot both obtain and prepare fraudulent checks.

### **Condition**

The detention center houses inmates for certain federal agencies. These inmates are able to place funds on account for commissary purchases. When processing federal inmate releases, the LESTs prepare checks for the balance of the inmate's commissary accounts. The checks include two signature lines. A LEST signs one signature line and an endorsement stamp with the director of Finance and Business Services signature is used for the second signature line. The blank checks and the endorsement stamp are not adequately secured as follows:

- The blank checks are stored in a dual locked file cabinet. One key to the file cabinet is secured in a lockbox and the other key is located in an unsecured desk drawer at the bail desk.
- The endorsement stamp is located in a locked desk drawer at the bail desk. The key to this desk drawer is located in an unlocked desk drawer of the same desk.
- All members of the unit have access to all the keys used to secure the blank checks and the endorsement stamp.

### **Cause**

In the past, the functions performed by intake LESTs were separate from functions performed by bail LESTs. All LESTs are being cross-trained to perform both functions and may spend part of their work week performing intake functions and part of their work week performing bail functions.

### **Effect**

The management control that requires staff members from two separate sections be present to obtain the blank checks and endorsement stamp no longer exists. One staff member can obtain both the blank checks and the signature stamp and prepare fraudulent checks. The bank reconciliation process performed by Finance and Business Services would catch the preparation of fraudulent checks. However, since all staff members have equal opportunity to obtain the blank checks and endorsement stamp, it would be difficult to identify and prosecute the offender.

## **Recommendation**

Detention and Enforcement management should establish physical controls over the file cabinet and desk drawer keys to access the blank checks and endorsement stamp to ensure that employees from different lines of authority are required to be present to obtain them.

## **6. Voiding Bail Transactions and the Audit of Bail Deposits**

### **Criteria**

Bail transactions should only be voided or deleted by employees that do not accept funds and process bails.

The Business Office audit procedures should ensure that all transactions have been correctly processed and the correct amount included in the bank deposit. This is required the City's Cash Handling Procedure (FN302a) which states:

3. *An employee (other than the cashier) designated by the department director shall:*
  - *Ensure that the cash, checks, and revenue receipts are in agreement.*

### **Condition**

The Law Enforcement Support Unit accepts cash bails and fees for bail bonds for inmates held at the detention center for Municipal Court charges. Currently, these transactions are processed through the Municipal Court's Mainframe computer system. Sequentially numbered forms called Transaction Receipts (TR) are created that document the receipt of funds. Detention and Enforcement Business Office staff members (Business Office) perform audits of the bail bank deposits.

The following issues associated with voiding bail transactions and the subsequent audits of bail deposits were identified:

- When needed, bail LESTs have intake LESTS void TRs. Staff members are being cross-trained to perform both the intake and bail functions. Access rights to the Municipal Court Mainframe have been modified to allow staff members to complete these functions which enable staff members to void TRs they process.
- Each shift, the total amount of cash and checks accepted is reconciled to the Municipal Court Mainframe shift reconciliation report and bank deposits are prepared. The process includes documenting the missing TR numbers and forwarding copies of the TRs to the Business Office. The Business Office bail audit process does not include determining why TRs are missing or verifying the continuity of TR sequence numbers from one shift to the next.

- The Municipal Court Mainframe system is designed to print TRs once. When TRs fail to print, they must be voided, the transactions re-entered, and a new numbered TR printed.
- The bank deposit documentation is forwarded to Municipal Court. A Municipal Court staff member represented that he does not research missing TRs.

### **Cause**

- In the past, the functions performed by intake LESTs were separate from functions performed by bail LESTs. All staff members are being cross-trained to perform both functions and may spend part of their work week performing intake functions and part of their work week performing bail functions. Programming changes enable staff to void their own transactions.
- The Business Office audit procedures do not include specific steps for reviewing voided transactions.

### **Effect**

Errors or irregularities associated with the bail process may not be addressed.

### **Recommendation**

The Municipal Court is in the process of migrating to a new Court Management System. Bail transactions will be processed through this system. Detention and Enforcement management should ensure adequate management controls are in place to include:

- Segregation of duties for the employees that accept funds for bail transactions and employees that void or delete processed bail transactions.
- Documented audit procedures to include a review of voided or deleted transactions and follow-up procedures for unusual circumstances.

## **7. Inmate Sentence Calculation**

### **Criteria**

***NRS 211.320 Credits for prisoner sentenced on or after October 1, 1991.***

*Section 1. For each month in which a prisoner who is sentenced to a term of imprisonment in a local detention facility:*

- a) Appears by the reports required by NRS 211.150, to have been obedient, orderly and faithful, the sheriff of the county or the chief of police of the municipality in which the prisoner is incarcerated may **deduct not more than 5 days from the term of imprisonment of the prisoner.***

- b) *Diligently performs his assigned work, the sheriff or chief of police may deduct:*
1. *Not more than 10 additional days if his term of imprisonment is 270 days or more;*
  2. *Not more than 7 additional days if his term of imprisonment is 180 days or more but less than 270 days;*
  3. *Not more than 5 additional days if his term of imprisonment is 30 days or more but less than 180 days;*
  4. *Not more than 3 additional days if his term of imprisonment is 15 days or more but less than 30 days; and*
  5. *No additional days if his term of imprisonment is less than 15 days.*

*Section 2. Deductions earned under subsection 1 for any period which is less than 1 month must be credited on a pro rata basis.*

*Section 5. As used in this section, "term of imprisonment" means the total number of days a prisoner is incarcerated in the facility, including, unless the court otherwise orders at his sentencing hearing, the time he actually spent in confinement from the date of his arrest to the date on which his sentence begins.*

## **Condition**

Pursuant to NRS 211.320, local detention centers have the discretion to reduce the sentences of inmates that *have been obedient, orderly, and faithful* (good time off) and *diligently perform their assigned work* (work time off). Audit procedures included reviewing the process used to calculate good and work time off and manually recalculating the Offendertrak calculations. The following issues were noted relating to the completion of these audit steps:

- Inquiries were made of three local detention centers to ascertain how they calculate good and work time off in accordance with NRS 211.320. These agencies indicated the good time calculation is based upon the inmate's sentence. Detention and Enforcement uses a combination of the inmate's sentence and *the time spent in confinement from date of arrest to the date of sentence* to calculate good time off for inmates. Detention and Enforcement's calculation gives inmates an additional reduction to their sentence for good time off.
- Detail testing of 50 inmate files from the period of November 1, 2007 through August 30, 2008 showed that eleven of the inmates were eligible to have their sentence reduced for good and work time in compliance with NRS 211.320. Three of the eleven inmates were not released in accordance with the manually calculated release date.

### **Cause**

- Detention and Enforcement management discussed how to interpret and implement changes to NRS 211.320 with the City Attorney's Office.
- Offendertrak calculates the release date including good and work time off. The programming used to calculate sentencing was transferred from the old jail management system. It is unknown why the system calculations did not agree with the manual calculations.

### **Effect**

- The City is not consistent with other local agencies in its application of NRS 211.320.
- Manually calculated release dates based upon Detention and Enforcement criteria do not always agree with Offendertrak calculated release dates.

### **Recommendation**

Detention and Enforcement management should re-evaluate the calculation of inmate good and work time off, determine if changes should be made to the calculations, and modify the programming in Offendertrak accordingly.

## **8. Offendertrak Computer System Access**

### **Criteria**

#### ***Information Security Procedure IT 134a.1 Responsibilities and Authority***

#### ***The Data Owner is responsible for:***

*Ensuring that only those individuals who have an operational need can access data.*

#### ***Individual Access Controls***

*Only properly authorized persons may access City systems. The following access controls must exist for every system/application used on the City's infrastructure:*

- *Individuals are granted access only to those information systems, databases, information, and resources necessary for the performance of their official duties; (part a)*

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

- *Access control processes must be in place for all applications and any changes to processes and access control mechanisms must be coordinated by the Data Owner and the ISCA; (part b)*
- *Access for persons who are not City employees or on contract to the City of Las Vegas, must be sponsored by an appropriate level of management (City Manager, Deputy City Manager, Department Director); and (part h)*
- *Access to accounts shall be disabled promptly upon the departure of a user or when a user's duties change and access is no longer authorized. (part i)*

### **Condition**

Offendertrak computer system access rights as of September 25, 2008 were compared to Human Resource data in Oracle to determine current employment status. The following information was noted:

- 23 former City employees have active user access rights.
- 1 current City employee who transferred to another City department has active user rights.
- Offendertrak computer system read-only access has been given to 240 employees of the Las Vegas Metropolitan Police Department (LVMPD). Procedures have not been established requiring LVMPD personnel to notify Detention and Enforcement personnel when Offendertrak access is no longer required.

### **Cause**

Detention and Enforcement does not have:

- A designated system administrator for Offendertrak.
- An established procedure to remove user computer access when an operational need no longer exists.

### **Effect**

The lack of regular monitoring of computer system access results in the potential for unauthorized access to Offendertrak and non-compliance with City IT policies.

### **Recommendation**

Detention and Enforcement management should:

- Remove active Offendertrak computer system access for the individuals indicated above.
- Develop, document, and implement procedures to ensure that Offendertrak computer system access is removed when:
  - employees leave employment with the City,

- employees assume City positions that no longer require access to Offendertrak, and
- users who are not City employees no longer require access to Offendertrak.
- Implement a periodic review of the computer system access rights to verify that all changes have been made.

## **9. Municipal Court Mainframe Computer System Access**

### **Criteria**

#### ***Information Security Procedure IT 134a.1 Responsibilities and Authority***

##### ***The Data Owner is responsible for:***

*Ensuring that only those individuals who have an operational need can access data.*

##### ***Individual Access Controls***

*Only properly authorized persons may access City systems. The following access controls must exist for every system/application used on the City's infrastructure:*

- *Individuals are granted access only to those information systems, databases, information, and resources necessary for the performance of their official duties; (part a)*
- *Access control processes must be in place for all applications and any changes to processes and access control mechanisms must be coordinated by the Data Owner and the ISCA; (part b)*
- *Access for persons who are not City employees or on contract to the City of Las Vegas, must be sponsored by an appropriate level of management (City Manager, Deputy City Manager, Department Director); and (part h)*
- *Access to accounts shall be disabled promptly upon the departure of a user or when a user's duties change and access is no longer authorized. (part i)*

### **Condition**

Detention and Enforcement personnel have access to the Municipal Court Mainframe computer system to perform various job responsibilities. A review of the September 30, 2008 Mainframe computer system access rights identified 97 Detention and Enforcement employees as users. These individuals were compared against Human Resource data in Oracle to determine current employment status. Of the 97 users, 23 former City employees and 4 individuals who could not be verified as either current or former City employees were identified as having active access rights to the Municipal Court Mainframe system.

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

**Cause**

Detention and Enforcement does not have an established procedure to notify the Municipal Court personnel of employee employment status changes.

**Effect**

The lack of regular monitoring of computer system access rights results in the potential for unauthorized access to the Municipal Court Mainframe system and non-compliance with City IT policies.

**Recommendation**

Detention and Enforcement management should implement procedures to notify the Municipal Court personnel of employment status changes that would affect access rights to the Municipal Court Mainframe system.

The Municipal Court is in the process of migrating to a new Court Management System. The implemented procedures should apply to this system as well.

## **MANAGEMENT RESPONSE**

### **1. Controls over Inmate Cash Received During the Booking Process**

#### **Recommendation:**

Detention and Enforcement management should implement the following management controls:

- Establish a single system to track cash received when inmates are booked into the detention center.
- Ensure that the system includes:
  - dual verification by Detention and Enforcement staff of the inmates' initial cash amounts,
  - a consistent method to document amounts received,
  - the ability to reconcile received cash to amounts returned or deposited for inmates, and
  - follow-up procedures when the dollar amount of received cash differs from the amount deposited.
- Establish physical controls over the keys to the dual lockbox and file cabinet for inmate funds stored in the Law Enforcement Support Unit. The physical controls should require employees from different lines of authority be present to open the dual lockbox and file cabinet.

Detention and Enforcement management is considering outsourcing the function of receipting cash received from inmates during the booking process. If outsourced, Detention and Enforcement management should ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,
- the computer system is adequately secured and appropriate backup procedures are in place, and
- they have established periodic monitoring procedures and reporting requirements.

#### **Management Action Plan:**

- The recommendation to establish a single system to track cash received when inmates are booked into the detention center is not feasible using existing software as it is now configured. The explanation is that we receipt money when inmates get booked into the facility, but do not place the money on the commissary account until they are sentenced because we do not know the length of time they are going to be in custody, to include if they decide to bail out. D&E and IT are investigating the possibility of modifying the Keefe

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

- Commissary software to allow it to track not only money in the commissary accounts, but also the money being held for non-sentenced inmates.
- D&E will establish a system and ensure that the system includes:
    - Dual verification by Detention and Enforcement staff of the inmates' initial cash amounts will be completed when exceeding the amount of \$250.
    - A consistent method to document amounts received by implementing a pre-list. The prelist would be generated by the staff receipting the money and would follow to the business office when the money is transferred over. We have two options to consider generating a pre-list. One is through Offendertrak and the other is through Keefe.
    - The ability to reconcile receipted cash to amounts returned or deposited for inmates by utilizing the pre-list. A copy of this list will follow with the money to the Business Office and a second copy of the list will go to the Business Office Supervisor to reconcile information.
    - Follow-up procedures when the dollar amount of receipted cash differs from the amount deposited will be completed by someone in the business Office that was not involved with the deposit.
  - Physical controls over the keys to the money drop box (dual lockbox) and FireKing Safe (file cabinet) for inmate funds stored in the Law Enforcement Support Unit will be established as follows. The physical controls will require employees from different lines of authority be present to open the money drop box (dual lockbox) and FireKing Safe (file cabinet). The money will be dropped in the money drop box (lockbox). Presently, all Law Enforcement Support Technician (LEST) staff has access to the money drop box (lockbox). There are two keys to enter the money drop box (lockbox), but one LEST is capable of obtaining both keys. One set of keys will remain on the LEST key ring and the other set of keys will be added to the LEST Supervisors key ring. Additionally, the LEST keys will be moved from the LEST Unit and placed into the Key Watcher System located outside of the LEST Unit. This system guarantees accountability and ensures specific authorization of keys. The same procedure will be implemented for the FireKing Safe.

Detention and Enforcement management is considering outsourcing the function of receipting cash received from inmates during the booking process. Vendors that can provide automated cash/coin collection machines are being sought, however, to date none have been identified that have a proven money collection system tested in a jail environment. If outsourced, Detention and Enforcement management will ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,
- the computer system is adequately secured and appropriate backup procedures are in place, and
- there will be established periodic monitoring procedures and reporting requirements.

### **Estimated Date of Completion**

December 31, 2009

## **2. Controls over Funds Placed on Account for Inmates**

### **Recommendation:**

Detention and Enforcement management should implement the following management controls:

- The initial opening of inmate funds received should be completed by two individuals and recorded on a pre-list. A copy of the pre-list should be forwarded to an employee independent of the deposit process.
- The inmate funds and a copy of the pre-list should be forwarded to the Business Office to be used for the deposit and posting to the commissary system.
- Once the deposit is complete, the deposit documentation and a summary from the commissary system should be forwarded to the same third party noted above. This individual should complete a review of the documentation to ensure all funds collected have been deposited and posted to the correct inmate account in the commissary system.

Detention and Enforcement management in coordination with Finance and Business Services is researching the feasibility of outsourcing receipting inmate funds submitted through the mail and the drop box. If outsourced, Detention and Enforcement management should ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,
- the computer system is adequately secured and appropriate backup procedures are in place, and
- they have established periodic monitoring procedures and reporting requirements.

### **Management Action Plan:**

- The initial opening of inmate funds received will be completed by two officers and recorded on a pre-list. A copy of the pre-list will be forwarded to the Business Office Supervisor who is an employee independent of the deposit process. We are exploring the options on how to automatically generate the pre-list to reduce the human error factor. Offendertrak and Keefe are included in these options.
- Once the deposit is complete, the deposit documentation will be forwarded to the Business Office Supervisor. The Business Office Supervisor will reconcile the pre-list with the summary from the commissary system to ensure

all funds collected have been deposited and posted to the correct inmate account in the commissary system.

- If for some reason the sealed money bag becomes unsealed at any point of the safekeeping, the money must be verified again by two people, resealed, and documented on the pre-list.

### **Estimated Date of Completion**

December 31, 2009

### **3. Business Office Inmate Fund Deposit Process**

#### **Recommendation:**

Detention and Enforcement management should implement controls to ensure that:

- Any funds forwarded to the Business Office for deposit include a listing by inmate and dollar amount of the funds that were transferred. This listing should also be forwarded to an individual independent of the deposit process.
- A copy of the deposit documentation and summary of the documentation posted to the commissary system is forwarded to the same independent individual. This individual should complete a review of the documentation to ensure all funds collected have been deposited and posted to the correct inmate account in the commissary system.
- An individual independent of the deposit process should complete follow-up on inmate inquiries.

Detention and Enforcement management is considering outsourcing the function of receiving funds received for inmates. Any funds placed on account would be deposited by this entity. If outsourced, Detention and Enforcement management should ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,
- the computer system is adequately secured and appropriate backup procedures are in place, and
- they have established periodic monitoring procedures and reporting requirements.

#### **Management Action Plan:**

- All funds forwarded to the Business Office for deposit will include a listing by inmate and dollar amount of the funds that were transferred on the pre-list. This pre-list will also be forwarded to the Business Office Supervisor, who is independent of the deposit process.

- Once the deposit is complete, the deposit documentation will be forwarded to the Business Office Supervisor. The Business Office Supervisor will reconcile the pre-list with the summary from the commissary system to ensure all funds collected have been deposited and posted to the correct inmate account in the commissary system.
- A Business Office Employee who was not part of the deposit process will complete follow-up on inmate inquiries.
- Once the outsourcing is completed and implemented, the only means for the public to deposit money will be through the kiosk, website or toll free call center. Upon implementation of these services, no money will be accepted through the mail. Notification to inmates and on the website will inform senders and recipients.

#### **Estimated Date of Completion**

December 31, 2009

#### **4. Return of Inmate Funds upon Release**

##### **Recommendation:**

Detention and Enforcement management should:

- Evaluate the available options for returning inmate funds.
- Limit processing inmate fund returns to once each day.

Detention and Enforcement management is considering outsourcing the function of returning funds to inmates. If outsourced, Detention and Enforcement management should ensure that:

- the contract includes a right-to-audit clause,
- the entity is bonded,
- the computer system is adequately secured and appropriate backup procedures are in place, and
- they have established periodic monitoring procedures and reporting requirements.

##### **Management Action Plan:**

Detention and Enforcement management has:

- We started evaluating the available options for returning inmate funds. We have researched the process to have the Keefe System print money orders. This system is new and there is not enough information on the reliability of this process. The best option at this time appears to be using pay cards. We have been researching this option and have identified two vendors that can

provide this service. We are having discussions with finance to select the vendor most suitable for us.

- We have limited processing inmate fund returns to once each day. This is effective as of **Monday, March 02, 2009**.

#### **Estimated Date of Completion**

- December 31, 2009
- Completed on Monday, March 02, 2009

### **5. Safeguarding Checks Used for Federal Inmates**

#### **Recommendation:**

Detention and Enforcement management should establish physical controls over the file cabinet and desk drawer keys to access the blank checks and endorsement stamp to ensure that employees from different lines of authority are required to be present to obtain them.

#### **Management Action Plan:**

D&E Management will establish physical controls over the file cabinet and desk drawer to access the blank checks and endorsement stamp to ensure the employees from different lines of authority are required to be present to obtain them by:

- Utilizing the Key Watcher System to store the two separate sets of keys needed to get in the FireKing Safe (file cabinet). The desk drawer will no longer be used to store the endorsement stamp.
- The blank checks will remain in the FireKing Safe. In order to get into this safe, a LEST Supervisor or LEST Acting Supervisor and a LEST will need to be present, as they each have a separate key needed to get in.
- The endorsement stamp will be secured in the lockbox that requires the Employee Access Badge to open it. The only staff authorized and having access to this lockbox will be the LEST Supervisors and LEST Acting Supervisors.

#### **Estimated Date of Completion**

December 31, 2009

## **6. Voiding Bail Transactions and the Audit of Bail Deposits**

### **Recommendation:**

The Municipal Court is in the process of migrating to a new Court Management System. Bail transactions will be processed through this system. Detention and Enforcement management should ensure adequate management controls are in place to include:

- Segregation of duties for the employees that accept funds for bail transactions and employees that void or delete processed bail transactions.
- Documented audit procedures to include a review of voided or deleted transactions and follow-up procedures for unusual circumstances.

### **Management Action Plan:**

D&E Management will ensure that adequate management controls are in place, to include:

- The LEST's access rights no longer will include "void functions." The LEST Supervisor's and LEST Acting Supervisor's will be the only staff authorized to have access rights at the level which voids can be executed. We will train additional staff as Acting LEST Supervisor's to ensure there is always a LEST Supervisor or a LEST Acting Supervisor on duty.
- The documented audit procedures, including a review of voided or deleted transactions and follow-up procedures for unusual circumstances will be as follows:
  - When a transaction receipt (TR) is missing, a memorandum with a detailed explanation shall be written in the place of the missing transaction receipt. This process will ensure there is accountability for all transaction receipts. All unusual circumstances will be looked into by the person conducting the bail audit (a business office employee) and the LEST Supervisor with follow-up documentation on the findings.

### **Estimated Date of Completion**

December 31, 2009

## **7. Inmate Sentence Calculation**

### **Recommendation:**

Detention and Enforcement management should re-evaluate the calculation of inmate good and work time off, determine if changes should be made to the calculations, and modify the programming in Offendertrak accordingly.

### **Management Action Plan:**

D&E has already begun the recommended evaluation process. We have received an expert opinion from the City Attorney's office. We are continuing to evaluate the calculation process and plan to reevaluate Offendertrak. The evaluation process includes:

- The interpretation of NRS from City Attorney which would significantly change the formula used for calculations.
- Testing the cases that the auditor provided. A total of eleven (11) cases were reviewed by the auditor and were determined to need further evaluation from D&E for clarification on sentence calculation. All cases computed correctly, with the exception of three (3). The next step is to further test the three (3) cases by re-entering the cases into Offendertrak training site and re-calculating the cases. Random testing will also be conducted to further determine if the Offendertrak system is calculating good time, work time and release dates accurately and in accordance with NRS.
- Hand calculations are being compared to Offendertrak calculations to determine consistency and accuracy.
- Follow up with the three (3) local agencies will be done and responses compared accordingly.
- If changes need to be made with the calculations and formula, Motorola will need to conduct additional testing, look at discrepancies and make modifications to the program. If modifications are needed, it will not be under contract and is estimated to be a fiscal impact. The other possibility is that the formula in place has a potential "glitch." If this is the case, D&E will need to demonstrate that it was a program error and we would not have discovered this during the testing phases prior to signing off. If that is the case, it may or may not incur a fiscal impact.

### **Estimated Date of Completion**

March 1, 2010

## **8. Offendertrak Computer System Access**

### **Recommendation:**

Detention and Enforcement management should:

- Remove active Offendertrak computer system access for the individuals indicated above.
- Develop, document, and implement procedures to ensure that Offendertrak computer system access is removed when:
  - employees leave employment with the City,

Audit of Detention and Enforcement's  
Inmate Booking and Release Processes  
April 2, 2009

- employees assume City positions that no longer require access to Offendertrak, and
- users who are not City employees no longer require access to Offendertrak.
- Implement a periodic review of the computer system access rights to verify that all changes have been made.

**Management Action Plan:**

- The active Offendertrak computer system access for the individuals listed above has been removed.
- D&E has a "Detention and Enforcement Employee Separation Checklist. A checkbox has been added to the checklist for "Remove from Offendertrak Database."
- Periodic review of the computer system access rights to verify all changes have been made will be implemented on a quarterly basis.

**Estimated Date of Completion**

December 31, 2009

**9. Municipal Court Mainframe Computer System Access**

**Recommendation:**

Detention and Enforcement management should implement procedures to notify the Municipal Court personnel of employment status changes that would affect access rights to the Municipal Court Mainframe system.

The Municipal Court is in the process of migrating to a new Court Management System. The implemented procedures should apply to this system as well.

**Management Action Plan:**

Detention and Enforcement management has implemented procedures to notify the Municipal Court personnel of employment status changes that would affect access rights to the Municipal Court Mainframe system. This will be executed by sending an e-mail. D&E has a "Detention and Enforcement Employee Separation Checklist. A checkbox has been added to the checklist for "E-mail municipal court requesting removal from Court Management System."

**Estimated Date of Completion**

December 31, 2009

**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT:** CITY AUDITOR'S OFFICE  
**DIRECTOR:** RADFORD SNELDING

Consent  Discussion

**SUBJECT:**

Discussion and possible action on the Audit of Fire Prevention Division (1303-0809-06)

**Fiscal Impact**

No Impact

Augmentation Required

Budget Funds Available

**Amount:**

**Funding Source:**

**Dept./Division:**

**PURPOSE/BACKGROUND:**

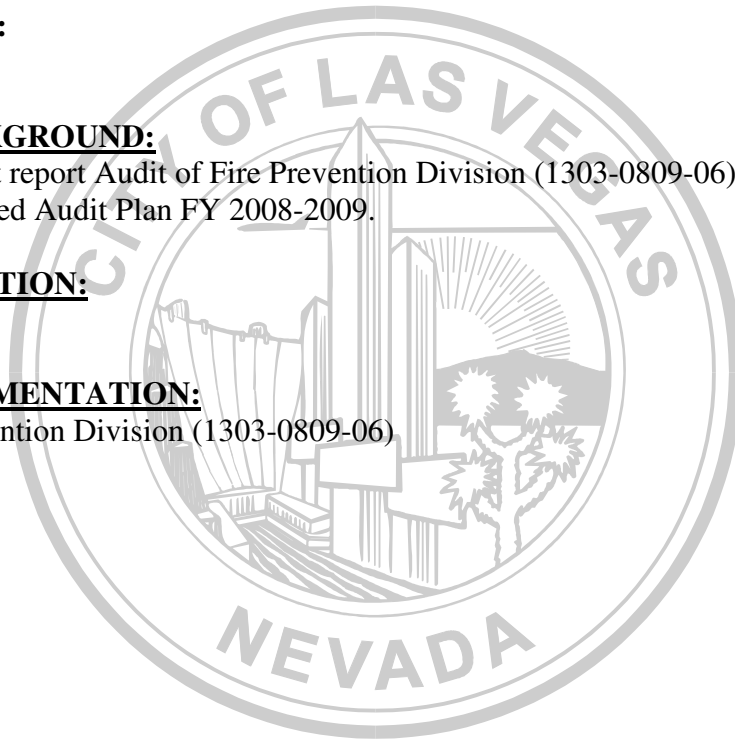
To review the audit report Audit of Fire Prevention Division (1303-0809-06). This audit was part of the authorized Audit Plan FY 2008-2009.

**RECOMMENDATION:**

Approval

**BACKUP DOCUMENTATION:**

Audit of Fire Prevention Division (1303-0809-06)



# **CITY AUDITOR'S OFFICE**



## **AUDIT OF FIRE PREVENTION DIVISION**

**Report No. CAO 1303-0809-06**

**April 3, 2009**

**RADFORD K. SNELDING, CPA, CIA, CFE**

**CITY AUDITOR**

## TABLE OF CONTENTS

|  |           |
|--|-----------|
| <b>BACKGROUND .....</b>                                    | <b>1</b>  |
| <b>OBJECTIVES .....</b>                                    | <b>2</b>  |
| <b>SCOPE AND METHODOLOGY .....</b>                         | <b>2</b>  |
| <b>CONCLUSIONS, FINDINGS, AND RECOMMENDATIONS.....</b>     | <b>3</b>  |
| <b>1. Quality Control Program.....</b>                     | <b>5</b>  |
| <b>2. Customer Service Requests.....</b>                   | <b>7</b>  |
| <b>3. Hazardous Materials Program.....</b>                 | <b>8</b>  |
| <b>4. Inspection Hierarchy .....</b>                       | <b>10</b> |
| <b>5. Interaction with Fire Suppression Personnel.....</b> | <b>11</b> |
| <b>6. Post-Fire Evaluations .....</b>                      | <b>13</b> |
| <b>7. Conflict of Interest Monitoring .....</b>            | <b>13</b> |
| <b>8. Fee Adjustments and Waivers.....</b>                 | <b>15</b> |
| <b>9. Management Reports .....</b>                         | <b>17</b> |
| <b>10. System Administration.....</b>                      | <b>18</b> |
| <b>MANAGEMENT RESPONSE .....</b>                           | <b>20</b> |

**AUDIT OF  
FIRE PREVENTION DIVISION  
CAO 1303-0809-06**

**BACKGROUND**

Fire Prevention is a division within the City of Las Vegas' Fire & Rescue Department (Fire & Rescue). According to Fire & Rescue's Strategic Business Plan, the purpose of Fire Prevention is to provide fire and life safety programs to the community so they can benefit from reduced risk of injury, death, and property loss due to fire and other hazards. Fire Prevention is led by the Fire Marshal who is also designated as a Deputy Fire Chief. The current Fire Marshal was promoted to his position in May 2008.

Fire Prevention is funded from the City's general fund. During fiscal year 2008, Fire Prevention had revenues of approximately \$1.07 million and expenditures of approximately \$4.52 million. Approximately 93% of the expenditures were salaries and benefits.

Fire Prevention is comprised of two sections including Fire Protection Engineering (Engineering) and Fire Code Enforcement (Code Enforcement). The function of fire and life safety education, previously a part of this division, has been transferred to Fire & Rescue's Office of Public Information and Education overseen by the Public Information Officer.

*Fire Protection Engineering*

The mission of Engineering is to "provide plan statement consultation, review, and permitting services to the construction community so they can have fire and life safety code compliant plans processed in a consistent and timely manner." Engineering reviews the following types of plans:

- Planning and zoning plans
- Site development plans
- Building plans
- Fire protection system plans

Engineering is led by a Fire Protection Engineer who currently oversees two Assistant Fire Protection Engineers (engineers). According to performance measurements tracked by Fire & Rescue, Engineering completed approximately 7,147 plan reviews during fiscal year 2008.

*Fire Code Enforcement*

The mission of Code Enforcement is to "provide consultation and inspection services to the development community, business owners, and residents so they can benefit from

reduced risk of injury death and property loss due to fire.” Code Enforcement completes the following types of inspections:

- New construction
- New business license applications
- Customer service requests
- Temporary use permits
- Work orders
- Annual renewable permits
- Annual inspections

Code Enforcement is led by two Deputy Fire Marshals. These management positions oversee a supervisor, 20 Fire Prevention Inspectors (inspectors), and an administrative staff. According to performance measurements tracked by Fire & Rescue, Code Enforcement completed approximately 26,594 inspections during fiscal year 2008.

Fire Prevention uses applications within the City’s asset management enterprise system known as Hansen for documenting their inspections and plan reviews.

Fire & Rescue is accredited by the Commission on Fire Accreditation International, Inc. (CFAI) and has the Insurance Service Office (ISO) Class 1 rating. During CFAI’s last peer assessment team review of Fire & Rescue in 2005, the following observation was made about Fire Prevention:

*The Prevention Division programs are effectively administered and address the city’s identified fire and non-fire related hazards.*

## **OBJECTIVES**

The audit objectives were to:

- Evaluate the overall effectiveness and efficiency of the operations of Fire Prevention.
- Evaluate the adequacy of oversight of employees and the quality controls over fire plan reviews and fire inspections.
- Evaluate the adequacy of internal controls over fees, fee adjustments, and fee waivers.

## **SCOPE AND METHODOLOGY**

The scope of this audit was limited to the Engineering and Code Enforcement operations of Fire Prevention. Detailed testing of records was primarily limited to transactions during fiscal year 2008. The last fieldwork date of this audit was February 13, 2009.

The scope of our work on internal control was limited to the controls within the context of the audit objectives and the scope of the audit.

Our audit methodology included:

- Research of applicable guidelines,
- Interviews of City personnel,
- Observations of work processes, and
- Analysis and detail testing of available data.

We conducted this performance audit in accordance with generally accepted government auditing standards except for the requirement for an external peer review every three years. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The exception to full compliance is because the City Auditor's Office has not yet undergone an external peer review. However, this exception has no affect on the audit or the assurances provided.

## **CONCLUSIONS, FINDINGS, AND RECOMMENDATIONS**

We identified the following issues during the audit of Fire Prevention:

**Quality Control Program (Finding 1):** Fire Prevention needs to create, document, and implement a formal quality control program to provide assurance that standards are being applied consistently and uniformly by its staff in conducting their plan reviews and inspections.

**Customer Service Requests (Finding 2):** Improvements are needed in how customer service requests are documented within the customer service request application and in the monitoring of the timeliness of response to these service requests.

**Hazardous Materials Program (Finding 3):** Fire Prevention needs to further evaluate how best to administer its hazardous materials program and document policies and procedures to be followed by its staff members.

**Inspection Hierarchy (Finding 4):** Fire Prevention needs to begin monitoring the inspection coverage achieved in total for each of the four occupancy code risk groups identified within its inspection hierarchy.

**Interaction with Fire Suppression Personnel (Finding 5):** Fire Prevention working with Fire Suppression needs to formalize expectations for interaction and communication between inspectors located at fire stations and the suppression personnel at these stations.

**Post-Fire Evaluations (Finding 6):** Following commercial fires, Fire Prevention needs to evaluate the adequacy of their procedures and the fire code and regulations by participating in the post-incident analysis with Fire Suppression personnel and reviewing reports compiled by fire investigators.

**Conflict of Interest Monitoring (Finding 7):** Fire Prevention needs to monitor outside employment information on its employees to identify and avoid conflicts of interest in their plan review and inspection assignments.

**Fee Adjustments and Waivers (Finding 8):** Fire Prevention needs to document policies and procedures to be followed in making fee adjustments and waivers. Fee adjustment and waiver reports need to be created and reviewed regularly by management independent of the transactions.

**Management Reports (Finding 9):** Fire Prevention needs to create desk procedures outlining the use of their standardized management reports for monitoring operations.

**System Administration (Finding 10):** One of the Deputy Fire Marshals administers the fire applications within Hansen and responds to system requests and problems as needed in addition to his official job responsibilities. Fire Prevention is in need of a contingency plan for the loss or extended absence of this Deputy Fire Marshal (e.g., increased system documentation, cross-training).

Further information is contained in the sections below. While other issues were identified and discussed with management, they were deemed less significant for reporting purposes.

## **1. Quality Control Program**

### **Criteria**

The following excerpts from the official job descriptions of the Deputy Fire Marshal, the Fire Prevention Inspection Supervisor, and the Fire Protection Engineer (management team) identify some of their responsibilities for monitoring the performance of their staff members:

#### *Deputy Fire Marshal*

- Plan, organize, administer, review and evaluate the activities and performance of staff.
- Prepare and conduct formal performance evaluations.
- Provide coaching for performance improvement and development.
- Review and assess staff training needs.
- Provide staff with continued technical support and training as required.

#### *Fire Prevention Inspection Supervisor*

- Plan, prioritize, assign, supervise and review the work of staff responsible for performing fire inspections including fire prevention and life safety inspections.
- Verify the work of assigned employees for accuracy, proper work methods and techniques, adherence to safe work practices and procedures and compliance with applicable standards and specifications.
- Prepare and conduct formal performance evaluations.
- Provide coaching for performance improvement and development.

#### *Fire Protection Engineer*

- Motivate and evaluate assigned staff.
- Review and evaluate work products, methods and procedures.
- Work with employees to develop short and long term goals, monitor accomplishments, establish performance requirements and personal development targets and provide coaching for performance improvement and development.

### **Condition**

The twenty Code Enforcement inspectors are managed by an Inspection Supervisor and two Deputy Fire Marshals. Inspectors are assigned responsibility for inspections within specific geographic areas within the City. Over the past couple years, many of these inspectors have been assigned to work out of fire stations within their designated areas rather than out of Fire Station 1 near City Hall. Accordingly, these inspectors regularly work independently in fulfilling their inspection assignments. The Inspection Supervisor and Deputy Fire Marshals will typically assist in more complex assignments.

The Fire Protection Engineer currently manages the work of two Assistant Fire Protection Engineers and works in the same office area with them thereby allowing for regular interaction with his staff members.

As documented in the official job descriptions for the management positions within Fire Prevention, the Inspection Supervisor, Deputy Fire Marshals, and the Fire Protection Engineer have the responsibility for ensuring that the inspectors and engineers are conducting inspections and plan reviews in accordance with applicable standards (i.e., fire code and regulations) and for providing coaching and evaluations. These members of management are a key control in ensuring the consistency and quality of inspections and plan reviews.

While the management team regularly reviews various operational activity reports, discusses issues with their staff members, holds monthly meetings, and accompanies inspectors on more complex inspections, there is no formalized quality control program in place for monitoring and evaluating the quality of the performance of the inspectors and engineers as evidenced by the following:

- The Code Enforcement management team does not systematically accompany inspectors or shadow inspectors following inspections with the intention of evaluating their performance and providing feedback to the inspectors.
- The Fire Protection Engineer does not formally and systematically review the work of his engineers.
- There is no formal, systematic review of the adequacy of the paperwork being completed and submitted for scanning and the data being input into Hansen.
- There are no formal annual evaluations of the staff members.

### **Cause**

- Lack of a formalized quality control program.

### **Effect**

- Without a formal and organized quality control program, there is an increased risk of inconsistencies or deficiencies in how inspectors and engineers are enforcing and applying the fire code.

### **Recommendation**

Fire Prevention management should create, document, and implement a formal quality control program to provide assurance that standards are being applied consistently and uniformly by its staff members in conducting plan reviews and inspections. This program should include at a minimum:

- Formal and systematic procedures for monitoring the quality of the work being performed by staff members in completing their inspections and plan reviews.

- Formal and systematic procedures for reviewing the adequacy of the paperwork being completed and submitted for scanning and the data being input into Hansen.

## **2. Customer Service Requests**

### **Criteria**

Effective monitoring of customer service requests includes reviewing the timeliness of responses to the requests.

The procedures by which data is entered into a system must be consistent to allow for effective activity monitoring.

### **Condition**

Fire Prevention receives various types of customer service requests (service requests) over the phone and through the mail or email. A “hotline” phone number is also available for after-hours calls. These service requests include notifications of fire and life safety system issues from fire protection contractors as required by law and reports from the public of fire hazards.

The service requests are input into the customer service request application within Hansen and assigned to inspectors based on their respective geographical work areas. The inspectors are expected to respond to the service request within three working days. Service requests of a serious nature are to be addressed immediately. The service requests are classified into one of the following categories:

- Fire alarm, sprinkler or other life safety system issues
- Hazardous materials
- Fire hydrant problems
- Fire department access or fire lane issues
- Residential

During the period from October 1, 2007 through September 30, 2008, Fire Prevention received 831 service requests. Approximately 74% of these service requests were fire and life safety system issues with most of these being reports from fire protection contractors.

The following issues were identified in reviewing a sample of service requests and in discussions with management:

- Inspectors are not consistent in their use of the customer service request application within Hansen.
- Delays in closing out service requests were identified. However, the reason for the delays is not always evident in reviewing the data within the application due

to the lack of the identification of an initial inspection date or documented comments. This information is sometimes documented in a different inspection application (i.e., annual renewable inspection application, annual inspections) and therefore not readily available in reviewing the customer service request application.

- Current management reports do not adequately identify outstanding service requests.
- The established service request categories are not always being used in identifying the nature of the service request.
- There is no prioritization of the service requests.

#### **Cause**

- Inconsistencies in how service requests are being documented and closed out in Hansen.
- Inadequate monitoring of the timeliness of response to the customer service requests.

#### **Effect**

- Timeliness of service request responses cannot be easily and accurately monitored with the inconsistencies in data input.
- Potential of service requests not being timely addressed without detection.

#### **Recommendation**

Fire Prevention management should:

- Re-evaluate their customer service request processing and monitoring procedures in consideration of the issues identified.
- Clearly define and document the procedures to be followed in documenting and closing out customer service requests in Hansen.
- Create customer service request monitoring reports that will identify requests that have not been responded to and closed out in Hansen.
- Regularly monitor the customer service request response times and the adequacy of the data being input into Hansen.

### **3. Hazardous Materials Program**

#### **Criteria**

An effectively managed hazardous materials program is an important function that can contribute to reducing the risk of hazardous material fires.

### **Condition**

Businesses within the City of Las Vegas with hazardous materials (used, stored, manufactured, or manufactured for transport) are required to annually report information on their operations and their hazardous materials inventories to Fire Prevention. These businesses must also have the appropriate city hazardous materials permit(s) and pay the appropriate fees based on the amount of stored hazardous materials.

Fire Prevention processes the hazardous materials documentation including evaluating the nature of the materials and the fire protection system and storage requirements, updating the Hansen system, and determining whether all permits have been obtained. Hazardous material inspections are completed to verify the accuracy of the inventory reports and the adequacy of the storage of the materials.

The following issues were identified related to Fire Prevention's hazardous materials program:

- Code Enforcement has not formally documented how its hazardous materials program is to be administered and the policies and procedures to be followed by its staff members.
- Code Enforcement has experienced delays in the processing of the submitted hazardous materials documentation as the initial processing and research is very time consuming and is primarily being completed by one individual, a Deputy Fire Marshal.
- The hazardous materials information gathered by Fire Prevention and input into Hansen needs to be current and accurate as this information will soon be accessible by Fire Suppression when responding to fires.

### **Cause**

- Lack of formally defined policies and procedures related to the hazardous materials program.
- Limited staffing for processing of hazardous materials documentation.

### **Effect**

- Delays in the processing of hazardous materials documentation and updating information within Hansen.

### **Recommendation**

Fire Prevention management should:

- Evaluate how the hazardous materials program can be most effectively administered considering the limited staffing resources and the varied skills of the

- inspectors. Consideration should be given to assignments or rotations of inspectors to help with processing the hazardous materials documentation.
- Document policies and procedures to be followed in administering the hazardous materials program.
  - Create standard reports that can regularly be reviewed to monitor the status of processing of hazardous materials documentation and completion of hazardous materials inspections.
  - Implement and document procedures for regularly reviewing these reports.
  - Evaluate what additional and reoccurring training may be needed for the hazardous materials program to operate effectively.

#### **4. Inspection Hierarchy**

##### **Criteria**

A significant measure of Fire Prevention's success is its effectiveness at inspecting higher risk occupancy locations on a regular basis.

##### **Condition**

Fire Prevention's inspection priorities include:

- new construction inspection requests
- business license application inspection requests
- customer service requests
- temporary use permits
- work orders
- annual renewable permits

The inspectors are also to complete annual fire inspections of existing businesses not included in any of the above categories. These inspections are to be completed in accordance with an inspection hierarchy created by Fire Prevention and outlined in their Standard Operating Procedure 770.10. The inspection hierarchy includes four risk groups of different fire code occupancy types (e.g., nursing home, motor fuel dispensing facility, high rise) with Group I identified as being the highest risk.

The following issues were identified relating to the monitoring of coverage of the inspection hierarchy groups:

- While Code Enforcement management monitors the completion of annual renewable permit inspections and inspections of select occupancy codes, they do not specifically track the total number and percentage of inspections completed within each inspection hierarchy group. This information would provide valuable information on Fire Prevention's performance in completing regular inspections of high risk businesses.

- The ability to monitor the date of the last inspection for occupancies within each risk group is hindered by inspections being tracked in two different applications within Hansen. A system user cannot query both applications for the last inspection date at a specific location.

#### **Cause**

- System obstacles to obtaining data on inspection coverage achieved in total for each of the four inspection hierarchy groups.

#### **Effect**

- Status of inspections by inspection hierarchy groups not readily available.
- Lack of ability to easily evaluate success in inspecting higher risk occupancies in total.

#### **Recommendation**

Fire Prevention management should:

- Evaluate the adequacy of the inspection hierarchy groups in relation to current risk methodology.
- Implement system enhancements that will facilitate improved tracking of inspection coverage provided within each of the four inspection hierarchy groups.
- Create standard reports that can be regularly run showing the inspection coverage achieved for each of the four hierarchy groups.
- Summarize the results periodically for review by the Fire Marshal.
- Evaluate whether these results should be added to Code Enforcement's established performance measurements.

## **5. Interaction with Fire Suppression Personnel**

#### **Criteria**

Effective interaction between staff of different organizational divisions requires management support, effective communication, and documentation of roles and responsibilities.

#### **Condition**

Over the past couple years, many of the Code Enforcement inspectors have been assigned office space at fire stations within their designated geographical inspection areas for use when they are not out in the field completing inspections (typically at the beginning and

end of each day). The initial objective in assigning inspectors to specific fire stations was to get them closer to their designated inspection areas.

While inspectors have informally fostered relationships with the fire suppression personnel at the fire stations and have attempted to share with them how they can be of value to them with their expertise in the fire code and fire and life safety systems, no formal directives have been documented and given to Fire Suppression and Fire Prevention personnel outlining expectations for interaction between the two divisions.

### **Cause**

- Initial objective of placing inspectors in fire stations did not extend beyond putting inspectors closer to their assigned areas.
- Lack of formal directives in this area to Fire Prevention and Fire Suppression personnel.

### **Effect**

- Potential for differences in involvement of inspectors with Fire Suppression personnel.
- Potential for obstacles to sharing of valuable information between the divisions.

### **Recommendation**

Fire Prevention management working with Fire Suppression management should provide documented directives to their personnel regarding their expectations for interaction between the Fire Suppression personnel and inspectors at the fire stations. Input on this directive should be sought from both Fire Suppression and Fire Prevention personnel. The following elements should be addressed in the directives:

- A declaration of support of the program from the Fire Chief and management from both Fire Suppression and Fire Prevention.
- Management's expectations for interaction between the personnel (i.e., meetings to attend, site visits to attend, etc.).
- Identification of useful information/documents to be shared between the personnel and how the information will be shared.
- Office area protocol (i.e., answering phones, use of fire station amenities, etc.).

## **6. Post-Fire Evaluations**

### **Criteria**

Post-fire evaluations of the performance of fire and life safety systems can help identify deficiencies in fire plan review and inspection procedures and the fire code and regulations.

### **Condition**

Fire Prevention management has the responsibility to continually be evaluating the adequacy of their methods and procedures and the adequacy of the fire code and regulations. Fire Prevention management does not currently complete or participate in post-fire evaluations to identify deficiencies in their plan review and inspection procedures or the fire code and regulations. Without completing these evaluations following a commercial fire, Fire Prevention management cannot fully evaluate the adequacy of their methods and procedures and the adequacy of the fire code and regulations.

### **Cause**

- Lack of requirement for Fire Prevention to complete or participate in post-fire evaluations of commercial fires.

### **Effect**

- Deficiencies in work procedures or the fire code and regulations may not be identified.

### **Recommendation**

Following commercial fires, Fire Prevention should evaluate the adequacy of their procedures and the fire code and regulations by participating in the post-incident analysis with Fire Suppression personnel and reviewing reports compiled by fire investigators.

## **7. Conflict of Interest Monitoring**

### **Criteria**

The potential for conflicts of interest by those in positions with opportunities to abuse their authority needs to regularly be evaluated by management using available information on outside employment.

Per Fire & Rescue Standard Operating Procedure 130.01, “All members [of Las Vegas Fire & Rescue] shall not engage in a conflict of interest to the department or use their position with the department for personal gain or influence.”

The following are excerpts from the City’s Operations Manual:

- City employees wishing to work, engage, or invest in outside employment, venture, or transaction who meet the criteria stipulated by the City’s Code of Ethics, the Personnel Policies Manual, Policy 3.12, and Article 29 of the CEA bargaining agreement shall complete an Outside Employment Request Form.
- Outside employment requests are required by all City employees to ensure that a second job does not create a conflict of interest with the employee’s position in the City.
- Required Authorizations (Signatures): Department Director, Human Resources Director
- The Personnel Services Division of the Human Resources Department distributes the form to the employee’s file, the initiating department, and the requesting employee.

### **Condition**

As noted in Fire & Rescue’s policies, employees are prohibited from engaging in any activity where there is a conflict of interest with their work responsibilities or where they use their position for personal gain or influence. This is especially important for Fire Prevention personnel considering the nature of their work and the potential for abuse of their position of authority.

There are currently no formal procedures followed by Fire Prevention to track or review outside employment information. Fire Prevention management does not currently receive copies of the outside employment forms submitted by their inspectors and engineers to Human Resources or a summary of the information contained thereon. Without access to the outside employment forms or the information contained thereon, management cannot adequately evaluate potential conflicts of interest in making plan review and inspection assignments.

A greater risk of conflict of interest exists with those inspectors and engineers who fail to disclose outside employment or interests. Fire Prevention does not currently have any procedures to minimize this additional risk.

In conjunction with our audit, we reviewed outside employment forms submitted to Human Resources by Fire Prevention employees. We did not identify any outside employment that we believed would create a conflict of interest with their job responsibilities.

### **Cause**

- Lack of readily available information on outside employment of inspectors and engineers for management evaluation of potential conflicts of interest.

### **Effect**

- Lack of ability by Fire Prevention management to properly evaluate potential conflicts of interest in making assignments.

### **Recommendation**

Fire Prevention management should implement procedures for evaluating potential conflicts of interest by their inspectors and engineers. The following elements should be included:

- Copies of all outside employment forms submitted to Human Resources by Fire Prevention personnel should be obtained and retained by Fire Prevention management.
- A summary of the information from these forms should be created for review by Fire Prevention management in monitoring inspection and plan review assignments.
- All inspectors and engineers should be required to keep Fire Prevention management aware of any changes to the status of their outside employment.
- Fire Prevention management should evaluate having all of its employees annually attest on a form as to whether or not they have outside employment or interests that could potentially be conflicts of interest with their assignments.

## **8. Fee Adjustments and Waivers**

### **Criteria**

Properly implemented internal controls over fee adjustments and waivers help ensure they are appropriate and authorized.

### **Condition**

Adjustments are regularly made to fire permit and plan review fees. Many of these are routine adjustments made by Finance in conjunction with the billing and payment process. Fee adjustments are also made periodically by select employees within Code Enforcement and Engineering.

Fee waivers are granted to governmental agencies as authorized in Fire Prevention's permit and fee schedule:

*Federal, state and local government entities are exempt from the payment of permit and plan check fees. Nonprofit organizations and special tax districts are not exempt from the payment of fees.*

The following deficiencies were noted in our review of the controls over adjustments and waivers:

- There are currently no documented policies and procedures on the processing of Fire Prevention adjustments and waivers.
- Explanations for adjustments and waivers are not consistently documented within Hansen.
- Explanations for adjustments and waivers are not consistently documented within the same data fields within Hansen.
- While access to making fee adjustments and waivers is limited to a select number of employees, there is no independent employee reviewing the transactions.
- No management reports are regularly created summarizing adjustments and waivers for independent review.
- While the fee exemption clause for government agencies appears to be straightforward, there are sometimes questions as to which agencies are eligible for exemption (e.g., quasi-governmental agencies). There is no further documented guidance on how Fire Prevention applies this exemption clause and which agencies specifically should qualify for the exemption.
- Use permit fees are not generated within the Hansen system for governmental agencies identified with a contractor code of GOVT. There is currently no formal, periodic review of the agencies identified within Hansen with this code to ensure that the GOVT code is appropriate.

### **Cause**

- Lack of formalized policies and procedures for processing and reviewing fee adjustments and waivers.
- Lack of documented guidance on how Fire Prevention applies the governmental agency exemption clause and which agencies specifically qualify for the exemption.

### **Effect**

- Potential for inappropriate fee adjustments and waivers without detection.
- Potential for inconsistencies in the processing of fee adjustments and waivers.

### **Recommendation**

Fire Prevention management should implement and document policies and procedures on the processing of fee adjustments and waivers including:

- Roles and responsibilities of Fire Prevention staff members in processing and reviewing fee adjustments and waivers.
- Identification of documentation to be retained on the fee adjustments and waivers.
- Identification of information required to be placed in Hansen and the location in Hansen where it should be recorded.
- Identification of authorizations required for fee adjustments and waivers.
- Identification of reports on fee adjustments and waivers to be run periodically for management review.
- Documented guidance on how Fire Prevention applies the governmental agency exemption clause and which agencies specifically qualify for the exemption.
- Requirement of periodic reviews of organizations identified within Hansen as being eligible for the exemption.

## **9. Management Reports**

### **Criteria**

Standard operating procedures (also known as desk procedures) address the key activities and processes of an organization, how they are performed, and by whom. They assist employees and management in performing the daily functions of an organization. These procedures formally establish employee accountability, provide orientation and reference material for employees, and document the institutional knowledge of existing staff in case of employee turnover or extended absences.

### **Condition**

The Deputy Fire Marshals and the Fire Protection Engineer regularly create and review various management reports to monitor operational activity. While these reports are reviewed and retained by management, formalized procedures have not been created or documented identifying the standard management reports, how they are to be used for monitoring operations, how often they are to be created, and who should be reviewing them.

### **Cause**

- Lack of documented procedures outlining the creation and use of standard management reports.

### **Effect**

- Potential for inconsistencies in the review of operational activity.
- Potential for loss of institutional knowledge about the reports in the case of employee turnover or extended absences.

## **Recommendation**

Fire Prevention management should create and document desk procedures outlining the following:

- Listing of standardized management reports.
- Position(s) responsible for creating the reports.
- Objective of reports and what should be reviewed.
- Identification of how often the reports are to be run and reviewed.
- Identification of how the results of these reports should be summarized.
- Report distribution listing.

## **10. System Administration**

### **Criteria**

Reliance on a single individual in an organization's operations creates a risk of loss of valuable information and technical expertise if that individual separates from employment or has an extended leave of absence from work.

The 2005 Accreditation report from the Commission on Fire Accreditation International, Inc. had the following recommendation:

*Create an authorized position to manage the city's asset management enterprise system (Hansen) to ensure the system has dedicated department staff to manage the system.*

### **Condition**

Fire & Rescue is currently very reliant on one of the Deputy Fire Marshals for administering the fire and life safety system applications within Hansen and responding to daily operational issues requiring knowledge of the system. This Deputy Fire Marshal was involved in the creation of the applications and therefore, continues to act as the administrator for these applications in addition to his other responsibilities.

Fire & Rescue is at risk for loss of valuable technical expertise in the fire & life safety system applications within Hansen if the Deputy Fire Marshal was to separate from employment with the City or have an extended absence. There is currently no formalized contingency plan for the loss or extended absence of this Deputy Fire Marshal.

### **Cause**

- Lack of a formalized contingency plan for loss of the Hansen fire prevention application administrator.

**Effect**

- Risk of loss of valuable technical expertise in the administration of the Hansen fire prevention application.

**Recommendation**

Fire Prevention management should develop and document a contingency plan for the administration of the fire applications within Hansen. The primary functions and responsibilities of the administrator should be documented for reference purposes. Reoccurring issues encountered by the administrator should also be documented. Consideration should be given to cross-training of other personnel in the primary functions of the administrator.

## **MANAGEMENT RESPONSE**

### **1. Quality Control Program**

#### **Recommendation:**

Fire Prevention management should create, document, and implement a formal quality control program to provide assurance that standards are being applied consistently and uniformly by its staff members in conducting plan reviews and inspections. This program should include at a minimum:

- Formal and systematic procedures for monitoring the quality of the work being performed by staff members in completing their inspections and plan reviews.
- Formal and systematic procedures for reviewing the adequacy of the paperwork being completed and submitted for scanning and the data being input into Hansen.

#### **Management Action Plan:**

Evaluation of field activities by Fire Prevention Inspection Supervisors and Deputy Fire Marshals will be more formalized through the following:

- Develop a standard by which all Fire Prevention Inspectors will be evaluated on.
- Develop a process that can objectively document the inspection process that is transparent to the Inspectors so there is no ambiguity in the standard being applied to them.
- Staff evaluation by a process of shadowing and field follow-up by having supervisors validate code violations identified by field staff.
- Document and publish a common practices (or lessons learned) manual for inspection staff to follow to increase consistency during the field inspection process.
- Reduce inconsistency of fire code enforcement through training and regular staff contact by field supervisors.
- Formal and systematic procedures for reviewing the adequacy of the paperwork being completed and submitted for scanning and the data being imputed into Hansen.

Fire Prevention will develop formal procedure for scanning of documents to:

- Eliminate inconsistencies on how documents are indexed in the records management system (eB).
- To insure that documents are properly indexed to the proper address by the Scan Center.
- To give guidance on what needs to be scanned and discarded in accordance with the records retention schedule.

Fire Prevention Inspection Supervisors will review Hansen input for accuracy and completeness by the following:

- Running reports on daily and weekly basis of Inspector activity to ensure the accuracy of data. This will also ensure that proper coding is used, violations are being correctly entered, and that inspection times are documented.
- Inspection staff will be corrected on an individual basis as needed, and staff directives will be written if group wide issues are identified.

**Estimated Date of Completion:**

The development of a Quality Control Program will take some time to develop and implement. The overall structure of the program will be outline by May 1, 2009, but the implementation and overall success may take up to 1 year. This program goes beyond just telling staff what is to be done or expected and the acceptance of oversight and monitoring will be needed to prevent motivational and performance issues.

## **2. Customer Service Requests**

**Recommendation:**

Fire Prevention management should:

- Re-evaluate their customer service request processing and monitoring procedures in consideration of the issues identified.
- Clearly define and document the procedures to be followed in documenting and closing out customer service requests in Hansen.
- Create customer service request monitoring reports that will identify requests that have not been responded to and closed out in Hansen.
- Regularly monitor the customer service request response times and the adequacy of the data being input into Hansen.

**Management Action Plan:**

Complaints that are received by this department will be given a priority code based on the issue identified. Currently all CSINSPs are group together and require a 3 day response from Fire Prevention staff. There are times when immediate response is needed by Fire Prevention, such as exits chained for an assembly of people at an ongoing event, which would require immediate attention. This is shorter time period than the reports received by fire protection contractors about a painted fire sprinkler head which can be waited on for response.

The complaint process will be rewritten to formalize the prioritization of the issues received. Inspection staff will be given specific dates to take action on CSINSP received and Supervisors and DFMs will monitor progress of CSINSP through daily reports.

The monitoring of the status of complaints in the system has already been addressed and will be accomplished on a daily basis by both the Inspector and their immediate supervisor with the implementation of the Mobile Highways interface for the field input devices. Separate reporting means are also available to supervisors by running crystal reports of outstanding CSINSPs.

**Estimated Date of Completion:**

The priority codes for CSINSPs are already an available option in the Hansen software program. The SOP (770.10) for CSINSP will be modified by April 1, 2009 to reflect the clarification in prioritization of CSINSPs.

The implementation of Mobile Highways software program is expected to be complete by March 15, 2009.

### **3. Hazardous Materials Program**

**Recommendation:**

Fire Prevention management should:

- Evaluate how the hazardous materials program can be most effectively administered considering the limited staffing resources and the varied skills of the inspectors. Consideration should be given to assignments or rotations of inspectors to help with processing the hazardous materials documentation.
- Document policies and procedures to be followed in administering the hazardous materials program.
- Create standard reports that can regularly be reviewed to monitor the status of processing of hazardous materials documentation and completion of hazardous materials inspections.
- Implement and document procedures for regularly reviewing these reports.
- Evaluate what additional and reoccurring training may be needed for the hazardous materials program to operate effectively.

**Management Action Plan:**

A standard operating procedure will be written on the collection and dissemination of hazardous materials documentation submitted to Fire Prevention. Fire Prevention will be determining the need for a specialize unit dealing with the data collection and inspection of facilities within the City of Las Vegas that store, handle, or use hazardous materials.

The Fire Prevention Division will create a Special Hazards Unit (SHU) to conduct compliance inspections of high-risk and hazardous materials occupancies to utilize their knowledge and abilities.

- The SHU will identify, inspect issue and modify existing use permits of occupancies storing and utilizing hazardous materials. Within this task the SHU will verify specific processes for code compliance associated to the operation.
- The SHU will utilize the database permitting system now in place to verify the existing hazardous materials inventory statements and plans, which are submitted to the fire department, with what is actually stored on-site.
- The SHU is to verify locations that have high-piled commodity storage configurations with the existing fire sprinklers design density to ensure adequate coverage of fire protection in the event of a fire.
- The SHU will assist area fire inspectors in assessing existing hazards with their expertise and identify potential deficiencies in fire protection systems installed in these high-risk occupancies.

The SHU will be supervised by a Grade 79 level person, either a Fire Prevention Inspection Supervisor, or Assistant Fire Protection Engineer. This will allow the person to give direction to Fire Prevention Inspectors on inspections required and procedures to be followed for inspections of identified facilities that hazardous materials associated with them. The SHU Supervisor can, as needed, assist inspectors within their respective inspection areas with large scale inspections and activities requiring multiple inspectors to accomplish. (Example: High-rise system code compliance testing). They may also attend construction meeting on major projects to assist the area inspector.

The hazardous materials compliance program will benefit by having the SHU by verifying the revenue recovered through permitting is accurately assessed and all sources are identified. The hazardous materials compliance program currently generates approximately \$400,000 in cost recovery fees for inspections conducted. A dedicated person to the SHU will lead to increase oversight of the program with the chance of increased cost recovery.

**Estimated Date of Completion:**

Benchmarks to be met:

Documentation review and revision by May 1, 2009.

Additional Position to be added - March 1, 2010?

**4. Inspection Hierarchy**

**Recommendation:**

Fire Prevention management should:

- Evaluate the adequacy of the inspection hierarchy groups in relation to current risk methodology.

- Implement system enhancements that will facilitate improved tracking of inspection coverage provided within each of the four inspection hierarchy groups.
- Create standard reports that can be regularly run showing the inspection coverage achieved for each of the four hierarchy groups.
- Summarize the results periodically for review by the Fire Marshal.
- Evaluate whether these results should be added to Code Enforcement's established performance measurements.

### **Management Action Plan:**

The inspection hierarchy groups are a product of work from the accreditation process that the fire department used for developing a hazard and risk assessment for occupancies in the city based on fire department response and not the impact on any specific business owner or occupant.

The reassessment of occupancies based on hazard and risk will focus more on a specific occupancy types and the impact on the community if a fire or other emergency were to occur. This may result in more than four groups being monitored and having numerical hierarchy established for inspection frequency.

Based on the revised rating schedule for occupancies, reports can be produced for city management and the Fire Marshal to review and monitor the effectiveness of Fire Prevention Division. These changes will eventually be added as a performance measure to be reported indicating that the more hazardous occupancies are being inspected with established timelines

### **Estimated Date of Completion:**

Completion of the hierarchal group reorganization should take place by May 1, 2009. This will include a standard methodology on how occupancies are evaluated and the inspection frequency required.

## **5. Interaction with Fire Suppression Personnel**

### **Recommendation:**

Fire Prevention management working with Fire Suppression management should provide documented directives to their personnel regarding their expectations for interaction between the Fire Suppression personnel and inspectors at the fire stations. Input on this directive should be sought from both Fire Suppression and Fire Prevention personnel. The following elements should be addressed in the directives:

- A declaration of support of the program from the Fire Chief and management from both Fire Suppression and Fire Prevention.

- Management's expectations for interaction between the personnel (i.e., meetings to attend, site visits to attend, etc.).
- Identification of useful information/documents to be shared between the personnel and how the information will be shared.
- Office area protocol (i.e., answering phones, use of fire station amenities, etc.).

**Management Action Plan:**

A policy will be drafted for the Fire Chiefs approval to outline the following items for fire department staff to follow when there is interaction between Fire Prevention personnel and those in other divisions:

Expectations for Fire Prevention Personnel assigned to Fire Stations and their interaction with fire station personnel.

Expectations for Fire Prevention personnel while at a scene of an ongoing emergency and their interaction with the incident commander.

Fire Preventions support for other Divisions within the fire department such as Training and Public Education.

**Estimated Date of Completion:**

Completion of this item will take place by August 1, 2009.

## **6. Post-Fire Evaluations**

**Recommendation:**

Following commercial fires, Fire Prevention should evaluate the adequacy of their procedures and the fire code and regulations by participating in the post-incident analysis with Fire Suppression personnel and reviewing reports compiled by fire investigators.

**Management Action Plan:**

Considering the current state of the economy and our reduced workforce, it is only realistic to predict that we won't be able to perform this task within the next couple of years. At that time, we need to develop the exact procedures, levels and the scope of involvement. Evaluations of the second and third alarm commercial fires, and also residential fires that involve activation of the residential fire sprinkler systems might be a starting point.

Educational and training measures must be taken to prepare me and my staff in being able to perform those functions in future. Those include attending the Arson

Investigation classes at the National Fire Academy (NFA) and obtaining the necessary certifications.

Systematic interaction with our Fire Investigators would also be quite valuable to provide us not only with the hands on training, but also the necessary professional cooperative relationship.

Arrange for a monthly informative coordination meeting between the Deputy Chief/Fire Marshal and the Fire Investigation/Bomb Squad Supervisor.

Establish formal process for the Deputy Chief/Fire Marshal to receive and review the fire investigation report as soon as they are prepared and officially filed.

**Estimated Date of Completion:**

Establishing the review mechanism for the fire investigation report and arrange the monthly coordination meeting could be accomplished by April 1, 2009.

Training and certification of the Fire Protection Engineering staff could be accomplished by the end of 2010.

Actual participation of the Fire Protection Engineering staff in the Post Fire Evaluations could be initiated by the middle of 2011.

## **7. Conflict of Interest Monitoring**

**Recommendation:**

Fire Prevention management should implement procedures for evaluating potential conflicts of interest by their inspectors and engineers. The following elements should be included:

- Copies of all outside employment forms submitted to Human Resources by Fire Prevention personnel should be obtained and retained by Fire Prevention management.
- A summary of the information from these forms should be created for review by Fire Prevention management in monitoring inspection and plan review assignments.
- All inspectors and engineers should be required to keep Fire Prevention management aware of any changes to the status of their outside employment.
- Fire Prevention management should evaluate having all of its employees annually attest on a form as to whether or not they have outside employment or interests that could potentially be conflicts of interest with their assignments.

**Management Action Plan:**

Outside employment and declaration is already addressed by Human Resources. The expectation is that Fire Inspection staff will not place themselves in a position of conflict or that would discredit the fire department. An annual request for declaration of outside employment will be requested and reviewed by the Fire Marshal before being forwarded to the Fire Chief. Additional oversight by fire prevention management would not have any added value to the process. All outside employment is required to be approved by the fire chief.

**Estimated Date of Completion:**

Already completed

## **8. Fee Adjustments and Waivers**

**Recommendation:**

Fire Prevention management should implement and document policies and procedures on the processing of fee adjustments and waivers including:

- Roles and responsibilities of Fire Prevention staff members in processing and reviewing fee adjustments and waivers.
- Identification of documentation to be retained on the fee adjustments and waivers.
- Identification of information required to be placed in Hansen and the location in Hansen where it should be recorded.
- Identification of authorizations required for fee adjustments and waivers.
- Identification of reports on fee adjustments and waivers to be run periodically for management review.
- Documented guidance on how Fire Prevention applies the governmental agency exemption clause and which agencies specifically qualify for the exemption.
- Requirement of periodic reviews of organizations identified within Hansen as being eligible for the exemption.

**Management Action Plan:**

Fire Prevention will establish a list of organizations that will not be charged fees based on local intergovernmental agreements, the current fee schedule, or other applicable state statutes. This list will be reviewed or changed as necessary when agreements are changed, or additional direction is given by city management.

Fee waivers or adjustments will be made by City Finance after billing has occurred in consultation with Fire Prevention determining the validity of the request.

Fee waivers or adjustments as the result of incorrect data entry will be made by the designated person in Fire Prevention (non-billable), such as permit fees in Fire Engineering.

**Estimated Date of Completion:**

List of waivers and associated justifications to be completed by April 1, 2009.

## **9. Management Reports**

**Recommendation:**

Fire Prevention management should create and document desk procedures outlining the following:

- Listing of standardized management reports.
- Position(s) responsible for creating the reports.
- Objective of reports and what should be reviewed.
- Identification of how often the reports are to be run and reviewed.
- Identification of how the results of these reports should be summarized.
- Report distribution listing.

**Management Action Plan:**

Fire Prevention Management staff has already standardized its reports for Performance Plus and those needed for monitoring inspection activity. These reports are categorized by the frequency on the time to be run. For example, reports are currently run on a daily, weekly, quarterly, and annually basis based on the need for information and level of monitoring. A separate distribution policy will be written to identify these reports and the frequency established for their need.

**Estimated Date of Completion:**

A majority of the reports are already written with the expectation that changes will be needed as new policies or performance measures are implemented. The policy for identifying these reports and timelines will be established by April 1, 2009.

## **10. System Administration**

**Recommendation:**

Fire Prevention management should develop and document a contingency plan for the administration of the fire applications within Hansen. The primary functions and

responsibilities of the administrator should be documented for reference purposes. Reoccurring issues encountered by the administrator should also be documented. Consideration should be given to cross-training of other personnel in the primary functions of the administrator.

**Management Action Plan:**

To better understand the administration of the entire Hansen system, each part needs to be defined. There are two administration roles for the Hansen enterprise system:

1. The primary administration i.e. adding an application, verifying stages, status of inspections, inspection scheduling or basic Hansen administration or system functionality is documented at this time. (Fire Protection Engineering, Fire Inspection, and Fire Prevention Clerical staff).
2. The specialized administration of the system i.e. creating of applications, modifying applications, condition statements, custom detail tabs, fee formulas, creation of imbedded reporting, Interactive Voice Response, etc, needs to reside with one specific person or designee to prevent conflict with other city departments due to the enterprise nature of the software program. As an example, this person should have IT background to understand the relational database, how it functions across the different Hansen templates all residing within the City of Las Vegas. There is documentation in the form of needs assessment created at the initial time of implementation that details the processes of Fire Prevention and its relationship to other departments.
3. Many of the sub systems related to the Hansen system and applications (Mobile device and staff training, primary administration, functionality questions and verification of the Use type permits) have been disbursed to other staff in Fire Prevention. This includes the questions that arise day to day.

**Estimated Date of Completion:**

The documentation for the implementation of the Hansen Software program is already in place. This documentation can be used by a person familiar with the database management programs and the Hansen software program. This documentation will be categorized by June 1, 2009 to be available by any person to refer to if necessary.

A specific timeline can not be established for hiring a person to take over system administration due to the ongoing financial conditions facing the City of Las Vegas. The administration of the program will stay with the designated Deputy Fire Marshal until an alternative is obtained.

**AGENDA SUMMARY PAGE**  
**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR**  
**DIRECTOR: RADFORD SNELDING**

**SUBJECT:**

**CITIZENS PARTICIPATION:** Public comment during this portion of the agenda must be limited to matters within the jurisdiction of the Committee. No subject may be acted upon by the Committee unless that subject is on the agenda and is scheduled for action. If you wish to be heard, come to the podium and give your name for the record. The amount of discussion on any single subject, as well as the amount of time any single speaker is allowed, may be limited



**AGENDA SUMMARY PAGE**

**AUDIT OVERSIGHT COMMITTEE MEETING OF: APRIL 23, 2009**

---

**DEPARTMENT: CITY AUDITOR**

**DIRECTOR: RADFORD SNELDING**

Consent  Discussion

**SUBJECT:**

ADJOURNMENT

